Hydrogen Sulfide Contingency Plan

Northwind Midstream, LLC – Titan Gas Gathering Plant
Lea County, New Mexico

Northwind Midstream, LLC
811 Louisiana Street
Suite 2500
Houston, TX 77002

May 2024

Prepared by:

GEOLEX INCORPORATED
500 Marquette Avenue NW, Suite 1350
Albuquerque, New Mexico 87102
(505) 842-8000

The following check list is provided by NMOCD to ensure completeness and accuracy of the components of the H_2S Contingency Plan. Requirements, applicable regulations, and location within this document are provided for reference.

Contingency Plan Requirements Checklist *(19.15.11.9.B NMAC Requirements)*	**Applicable Regulation(s)**	**Included** *(Yes/No)*	**Document Page**
Emergency Procedures			
Responsibilities and duties of personnel during an emergency	19.15.11.9.B.2.a 19.15.11.9.B.2.d	Yes	Pg. 2-3 Fig. 8,9
Immediate action plan	19.15.11.9.B.2.a; 19.15.11.9.B.2.d; 12.15.11.12.D.2 (well control)	Yes	Pg. 3-4 Appx. B
Evacuation and shelter in place plan	19.15.11.9.B.2.a; 19.15.11.9.B.2.d	Yes	Pg. 1,4 Fig. 3,4 Appx. B,C
Telephone Numbers: Emergency Responders	19.15.11.9.B.2.a 19.15.11.9.H	Yes	Appx. D
Telephone Numbers: Public Agencies	19.15.11.9.B.2.a; 19.15.11.9.H	Yes	Appx. D
Telephone Numbers: Local Government	19.15.11.9.B.2.a; 19.15.11.9.H	Yes	Appx. D
Telephone Numbers: Appropriate Public	19.15.11.9.B.2.a	Yes	Appx. D
Location of potentially affected public areas	19.15.11.7.H; 19.15.11.8.C.2; 19.15.11.8.D; 19.15.11.9.A; 19.15.11.9.B.2.a; 19.15.11.9.D.2; 19.15.11.11.D; 19.15.11.12.B.2.a; 19.15.11.12.D	Yes	Pg. 4-5 Fig. 4
Location of potentially affected public roads	19.15.11.7.H.2; 19.15.11.7.J; 19.15.11.9.B.2.a; 19.15.11.9.B.2.c; 19.15.11.9.C	Yes	Pg. 4-5 Fig. 4
Proposed evacuation routes including the locations of roadblocks	19.15.11.9.B.2.a; 19.15.11.9.B.2.d	Yes	Fig. 3,4
Public notification procedures	19.15.11.9.B.2.a	Yes	Pg. 3-5 Appx. B, C
Availability and location of safety equipment and supplies	19.15.11.9.B.2.a; 19.15.11.11.C; 19.15.11.12.D	Yes	Pg. 3-8 Fig. 3
Characteristics of Hydrogen Sulfide and Sulfur Dioxide			
Discussion of characteristics	19.15.11.9.B.2.b	Yes	Pg. 9-11
Maps and Drawings			
Area(s) of exposure	19.15.11.7.B; 19.15.11.9.B.2.c	Yes	Pg. 15 Fig. 4 Appx. E
Public areas within area of exposure	19.15.11.7.B; 19.15.11.7.H; 19.15.11.7.I; 19.15.11.7.K.1-3; 19.15.11.8.C.1-2; 19.15.11.8.D; 19.15.11.9.B.2.c; 19.15.11.9.C; 19.15.11.9.D.2; 19.15.11.11.D; 19.15.11.11.E; 19.15.11.12.D; 19.15.11.12.D.	Yes	Pg. 4-5 Fig. 4
Public roads within area of exposure	19.15.11.9.B.2.a; 19.15.11.9.B.2.c; 19.15.11.9.C	Yes	Pg. 4-5 Fig. 4
Training and Drills			
Training of personnel to include responsibilities, duties, hazards, detection, personal protection and contingency procedure	19.15.11.9.B.2.a; 19.15.11.9.B.2.d; 19.15.11.12; 19.15.11.13	Yes	Pg. 14-15 Appx. B
Periodic drills or exercises that simulate a release	19.15.11.9.B.2.d	Yes	Pg. 14-15
Documentation of training, drills, and attendance	19.15.11.9.B.2.d	Yes	Pg. 16
Training of residents on protective measures	19.15.11.9.B.2.d	Yes	Pg.14-15
Briefing of public officials on evacuation or	19.15.11.9.B.2.a; 19.15.11.9.B.2.d	Yes	Pg. 14-15

Contingency Plan Requirements Checklist *(19.15.11.9.B NMAC Requirements)*	Applicable Regulation(s)	Included *(Yes/No)*	Document Page
Coordination With State Emergency Plans			
How emergency response actions will coordinate with the OCD and the State Police response plans	19.15.11.9.B.2.e	Yes	Pg. 16 Appx. B
Plan Activation Levels			
Activation levels and description of events which may lead to a release in excess of activation level	19.15.11.9.B.2.f; 19.15.11.9.C; 19.05.11.16	Yes	Pg. 17 Appx. B, C
Plan Activation			
Commitment to activate contingency plan whenever H_2S concentration of more than 100 ppm in a public area or 500 ppm at a public road	19.15.11.7.H & 19.15.11.7.I; 19.15.11.9.B.2.a; 19.15.11.9.B.2.c; 19.15.11.9.C	Yes	Pg. 17 Appx. B, C
Commitment to activate contingency plan whenever H_2S concentration of more than 100 ppm 3000 feet from the site of release	19.15.11.7.H; 19.15.11.9.C	Yes	Pg. 17 Appx. B, C
Acid Gas Injection Well Information			
Well name, API#, legal description, map location, figures and/or construction diagrams	API RP-49 Recommended Practice for Drilling & Well Servicing Operations Involving Hydrogen Sulfide; API RP-54 Recommended Practice for Occupational Safety for Oil & Gas Drilling & Servicing Operations	Yes	Pg. vi, 1 Fig. 1, 4-7
Compliance with OCD "Well" Regulations	19.15.11.7K(3); 19.15.11.9B(2); 19.15.11.9H; 19.15.11.10; 19.15.11.11; 19.15.11.12; 19.15.11.16	Yes	Pg. 1,2-3, 6, 8-9, 12-16 Fig. 3,4 Appx. B, H
Compliance with applicable standards	API RP-49; API RP-54 (formerly RP-68); API RP-55; & NACE Standards for Sour Gas Wells	Yes	Pg. 1
Adequate H_2S Detection Monitoring	19.15.11.11.B	Yes	Pg. 2-3,5-8 Fig. 2 Appx. B
Notification of contingency plan implementation with C-141 full report submitted to the OCD within 15-days of release	19.15.11.16	Yes	Pg.16 Appx. H
Miscellaneous			
AGI Well Location	19.15.11.7K(3); 19.15.11.9B(2); 19.15.11.9H; 19.15.11.10; 19.15.11.11; 19.15.11.12; 19.15.11.16	Yes	Pg. vi Fig. 4-7
Pipeline(s)	19.15.11.12; 19.15.11.12.B; 19.15.11.12.C	Yes	Fig. 11
Flare Stack	19.15.11.11.D	Yes	Pg. 8 Fig. 2-3
Signs	19.15.11.10	Yes	Pg.7, 12-14 Fig. 10
Emergency Shut Down (ESD)	19.15.11.12.D.1	Yes	Pg. 6 Fig. 2
Hazards	19.15.11.13	Yes	Pg. 2
AGI Wells	19.15.11.7.D.2-4; 19.15.11.7K(3); 19.15.11.9B(2);19.15.11.9H; 19.15.11.10; 19.15.11.11; 19.15.11.12; 19.15.11.16	Yes	Pg. 1,2-3, 6,12-14 Fig. 5-7 Appx. B, H
Maps and Drawings	19.15.11.9.B.2.c	Yes	Pg. 14

Table of Contents

Location of the Northwind Midstream Titan Gas Treatment Plant:

Northwind Midstream Partners, LLC is to construct and operate an approved acid-gas injection (AGI) well as a part of the Titan Gas Treatment Plant in Lea County, New Mexico. The treatment plant and associated AGI well, the Salt Creek AGI #3 (30-025-51865) and plugged and abandoned Salt Creek AGI #1 (30- 025-46746), are in Section 21 of Township 26 South, Range 36 East on land owned by Northwind Midstream, LLC. A map of the facility location is included in Figure 1.

Titan Gas Treatment Plant Mailing Address:

811 Louisiana Street
Suite 2500
Houston, TX 77002

Driving Directions from Jal, NM to Titan Gas Treatment Plant

From Jal, NM (intersection of 3rd Street and W. Kansas Avenue), drive south on 3rd Street for 1.3 miles. Continue south on Frying Pan Rd for 6.8 miles. After, turn right onto Beckham Rd, continuing for 1.4 miles before turning right. After 0.8 miles, make another right. Last, turn right and follow the road for 0.3 miles before approaching the entrance to the treating facility on the left.

Acid Gas Injection Well Location:

Salt Creek AGI #3 API:	30-025-51865
AGI #3 Well Surface Location:	278 FWL & 2,329 FSL LAT: 32.027965 (NAD83) LONG: -103.277702 (NAD83)
Salt Creek AGI #1 API: (plugged and abandoned)	30-025-46746
AGI #1 Well Surface Location:	177 FWL & 2,397 FSL LAT: 32.028103 (NAD83) LONG: -103.278026 (NAD83)

Northwind Midstream Corporate Address:

Northwind Midstream Partners, LLC
811 Louisiana Street
Suite 2500
Houston, TX 77002

NORTHWIND MIDSTREAM

Glossary of Acronyms Utilized in the H_2S Contingency Plan

ACGIH	American Conference of Governmental Industrial Hygienists
AGI	Acid Gas Injection
ANSI	American National Standards Institute
API	American Petroleum Institute
CO_2	Carbon Dioxide
DCS	Distributed Control System
DOT	Department of Transportation
ERO	Emergency Response Officer
ESD	Emergency Shutdown
H_2S	Hydrogen Sulfide
IC	Incident Commander
ICS	Incident Command System
ICC	Incident Command Center
IDLH	Immediately Dangerous to Life or Health
LEL	Lower Explosive Limit
LEPC	Local Emergency Planning Committee
MSDS	Materials Safety Data Sheets
NACE	National Association of Corrosion Engineers
NCP	National Contingency Plan
NIIMS	National Interagency Incident Management System
NIOSH	National Institute of Occupational Safety and Health
NGL	Natural Gas Liquid
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NMOCC	New Mexico Oil Conservation Commission
OCD	Oil Conservation Division
OSHA	Occupational Safety and Health Administration
PLC	Programmable Logic Controller
PPE	Personal Protective Equipment
PPM	Parts Per Million
ROE	Radius of Exposure
SCBA	Self-Contained Breathing Apparatus
SERC	State Emergency Response Commission
SO_2	Sulfur Dioxide
STEL	Short Term Exposure Limit
TLV	Threshold Limit Value
TWA	Time Weighted Average

1.0 Introduction

This project is an expansion of the existing 50 MMSCFD amine treating facility, previously operated by Salt Creek Midstream. Northwind Midstream will construct a 150 MMSCFD amine treating facility equipped with an acid-gas injection well for the disposal of treated acid gas. The Titan Gathering System encompasses three Compressor Stations (hereafter the "booster stations", "compressor stations", or "stations") and a sour gas treatment facility with a permitted right-of-way (ROW) that transports sour natural gas from gathering systems to the Titan Gas Treatment Plant (the "Plant"). The pipeline will range between six to twenty inches in diameter and spans over 100 miles throughout Lea County, New Mexico.

The sour natural gas will be sweetened within the Titan Treatment Plant and the associated waste gases (H_2S and CO_2) will be permanently sequestered in deep geologic reservoirs via the acid-gas injection (AGI) wells. The natural gas being transported by the Titan Gathering System contains hydrogen sulfide (H_2S) therefore, this H_2S Contingency Plan (the "Plan") is being submitted to document procedures that are to be followed in the event of an unintended release of H_2S that occurs anywhere at the Plant, AGI processing area where the injection wells are, or will be located, or at the wells themselves. A separate H_2S Contingency Plan has been developed that covers the Titan Gathering System and compressor stations.

The Plan complies with New Mexico Oil Conservation Division (NMOCD) Rule 11(§19.15.11 et. seq. NMAC). The plan and operation of the Titan Gas Treatment Plant conform to standards set forth in API RP-55 *"Recommended Practice for Oil and Gas Producing and Gas Processing Plant Operations Involving Hydrogen Sulfide"*, as well as API RP-49 *"Recommended Practice for Drilling and Well Servicing Operations Involving Hydrogen Sulfide"*, API RP-68 *"Oil and Gas Well Servicing and Workover Operations involving Hydrogen Sulfide"*, and applicable NACE standards for sour gas service and current best industry practices.

Safety precautions in the event of a release may include the placement of roadblocks, designated evacuation routes, or shelter-in-place instructions. When the term "shelter-in-place" is used within this Plan, it indicates that individuals should go inside homes, businesses, and turn off heating and air-conditioning systems, close windows and doors, seal the frames, and wait for further instruction from the Incident Commander.

2.0 Scope

[API RP-55 7.2]

This Plan is specific to the Titan Gas Treatment Plant, associated AGI facilities, and the AGI wells (Salt Creek AGI #1 and #3). It contains procedures to provide for an organized response to a potential unplanned release of H_2S from the Plant or AGI wells associated with the Plant, and documents the procedures that would be followed to alert and protect any members of the public, residents within the surrounding areas, and/or contractors working on or around the plant in the event of a potential unplanned release. This H_2S Contingency Plan has been developed in coordination with state and local authorities (see Appendix J) and has been prepared to minimize the hazard resulting from a potential unplanned H_2S release. It will be used to inform company personnel, local emergency responders and the public of actions to be taken should the Plant experience such an H_2S release.

All operations shall be performed with safety to the employees, the public, and to protect the environment as the primary goal. The highest priority of the Titan Gas Treatment Plant, during a potential unplanned H_2S release, is to protect company employees, contractors, and the public; the secondary concern is to minimize the damage and other adverse effects of the emergency. In the event of a release, any part of the Plant operation that might compromise the safety of individuals will cease until the operation can be re-evaluated and the proper engineering controls implemented to assure safety.

⚠	**WARNING:** No individual should place the protection of the Plant property above his or her own personal safety.

Per NMOCD request, Northwind Midstream will notify all producers with wells that feed into the Northwind Midstream gas gathering line that they are also subject to additional oversight and H_2S regulations.

In a serious situation involving an H_2S release, not only Northwind personnel are involved, but local Fire Departments, Law Enforcement, City, County, and State of New Mexico agencies may be interested parties. Cooperation will expedite all decisions. In any emergency situation involving a H_2S release, delegation of duties will be made to appropriate employees and groups. These duties and procedures are reviewed on an annual basis to ensure complete understanding and facilitate a well-coordinated response by all involved personnel to the emergency.

2.1 Facility Hazard Summary

Several potential hazards are identified and addressed by Northwind Midstream at the Titan Facility. Typical hazards associated with such a treatment plant are fire, related to the flammable material being transported and treated, explosion from compression, and exposure to toxic materials such as sour gas, acid gas, and chemicals used in conjunction with the treatment of sour gas. With such hazards present, Northwind Midstream emergency procedures describe what is necessary during an emergency, the characteristics of the toxic chemicals at the plant, potentially impacted areas, and training drills to inform personnel and the public of such hazards.

3.0 Plan Availability

[API RP-55 7.3]

The H_2S Plan shall be available to all personnel responsible for implementation, regardless of their normal location assignment. A copy of the Plan will be maintained at the Titan Facility Control Room, in the Plant Manager's office at the plant, and on Northwind's Corporate internal website. See Appendix F for the complete H_2S Plan Distribution List, which lists all the additional entities and agencies that will be provided with a copy of the approved H_2S Plan.

4.0 Emergency Procedures

[NMAC 19.15.11.9.B(2)(A)], [API RP-55 7.4A]

4.1 Responsibility and Duties of Personnel During an Emergency

It is the responsibility of all on-site personnel to follow the safety and emergency procedures outlined within this H_2S Contingency Plan, as well as any facility-specific safety plans retained by Northwind. The Titan Plant uses the Incident Command System (ICS) for emergency response (see Figure 8 for a diagram of the command structure and Figure 9 for detailed information). The ICS structure used is based on the National Interagency Incident Management System (NIIMS) and is consistent with the National Contingency Plan (NCP). All Northwind employees, on-site, along the pipeline ROW, at the Compressor Stations, or at the Titan Treating Plant, shall be prepared to respond to an H_2S emergency at the Plant as part of the Operations Response Team (ORT).

All on-site employees must be H_2S certified, and that certification must be renewed on an annual basis. In the event that an unplanned release is detected, the first person to discover the issue/release or their designee, by default, will become the on-scene Incident Commander (IC within this Plan) until the responsibility is transferred to appropriate facility personnel. This responsibility should be formally transferred to the Plant Manager as soon as practical. All personnel will be evacuated out of the affected area, and the IC will contact and coordinate with Northwind management if an H_2S emergency occurs. Northwind personnel will immediately respond to the emergency, as detailed in Appendices B and C of this plan, and the IC will contact and coordinate with Northwind's management team.

The Plant Manager/IC or designee shall determine the need for, and implement as necessary:

1. Total Facility Shutdown(s)
2. Isolation of pipelines or pipeline segments
3. Repairs, tests, or restarts as required

If an emergency occurs, the Plant Manager or their designee shall be notified first, and that individual will notify the Chief Operating Officer who will activate the Corporate Emergency Response Plan. If any person in this chain of command is unavailable, the individual making the call will elevate the

communication to the next level. The intention of this process is to allow the IC to make one phone call and then be able to focus on the incident response.

4.1.1 *Site Security*

[NMAC 19.15.11.12.b]

In order to have an accurate listing of all personnel on-site in the event of an emergency, a daily sign-in log sheet will be utilized. The sign-in log sheet will include, at a minimum, the name of the individual entering the plant, the company name, time of arrival, and time of departure. All personnel are required to sign in at the Plant Office/Control Room. In compliance with 19.15.11.12.B NMAC, the Plant and AGI wells are contained within a secure fenced area with locking gates.

4.1.2 *Discovery and Internal Reporting*

All personnel, including contractors who perform operations, maintenance and/or repair work on any part of the treatment facility, including off-site Booster Stations or Pipelines, must wear personal H_2S monitoring devices to assist them in detecting the presence of H_2S. Fixed H_2S monitors are also strategically located within the Titan facility around various process units. Both personal and fixed monitoring devices will provide an alarm (audible) at 10 ppm.

Personnel discovering a leak or emissions release should first attempt to resolve the issue if they are safely able to do so and H_2S levels remain below 10 ppm. If the person discovering the leak is not trained and/or authorized to perform mitigative actions, or the response required to resolve the issue calls for invasive actions (i.e., more than valve manipulation, pug installation, etc.) the individual shall notify the Control Room Operator. The Operator will contact the Plant Manager or his designee so that the person can activate the H_2S Contingency Plan, if necessary. The Control Room Operator will also initiate and maintain a Chronologic Record of Events Log (see Appendix G) which records the time, date, and summary of events.

The record will include, at a minimum, the following information:

- Name, telephone number, and location of person reporting the situation
- Type and severity of the emergency
- Location of the emergency and distance to surrounding equipment and/or structures
- The cause of the release, leak, or spill
- Name, and quantity of material released, and extent of the affected area including the degree of environmental hazard
- Description of injuries (if any) and report of damage to property and structures

If any person detects H_2S levels of 10 ppm or greater, either as a result of an alarm from their personal monitoring device or one of the facility's fixed monitors, they must immediately report this to the Control Room Operator who will contact the Plant Manager for assistance.

If the alarm persists, the responding Operator will don a 30-minute Self Contained Breathing Apparatus (SCBA) and notify the Plant Manager or his designee so that the H_2S Contingency Plan can be activated, if necessary. Additionally, all non-essential persons shall be notified of the release and evacuated from the area. The responding Operator, wearing the SCBA, will first help any persons requiring assistance during the evacuation prior to attempting to resolve the issue.

Once the Plant Manager/IC is contacted, they or their designee must contact the appropriate Northwind management and Titan Treatment Plant emergency response personnel (Figure 9 and Appendix D) and notify them of the existing situation. Local emergency response providers will also be contacted as deemed necessary by the IC. As necessary, the Control Room Operator will then conduct the notifications of federal and state regulatory agencies including the BLM Field Office in Carlsbad (if applicable), the NMOCD District Office in Hobbs, and emergency response agencies listed in Appendix D. Northwind personnel will instruct any contractor and all others attempting to enter the vicinity of the area that the H_2S Contingency Plan has been activated and that they must follow the direction of the IC

4.2 Immediate Action Plan

Immediate Action Plans outlining procedures and decision processes to be used in the event of an H_2S release are contained in Appendix B. These procedures and decision processes have been designed to ensure a coordinated, efficient, and immediate action plan for alerting and protecting operating

personnel and the public as well as to prevent or minimize environmental hazards and damage to property.

Emergency response actions may be taken for a variety of situations that may occur. The Plan is activated in progressive levels (Level 1, Level 2 and Level 3), based on the concentration and duration of the H_2S release. Response Flow Diagrams illustrating these Immediate Action Plans are contained in Appendix C.

	ATTENTION: Northwind on-site personnel or Control Room Operators are authorized to elevate the level of response, based upon observed conditions, if they feel a lower-level response may not be effective in protecting personnel, the public, or the environment.

Additional or long-term response actions will be determined on a case-by-case basis once the Incident Command Center (ICC) and System (ICS) are established following the immediate response.

4.3 Telephone Numbers, Communication Methods, and Media Site

4.3.1 *Telephone Numbers and Communication Methods*

In the event of activation of the Plan at Level 3, emergency responders, public agencies, local government, and other appropriate public authorities must be contacted. Public awareness and communication are a primary function of this Plan. As such, Northwind has compiled a list of various public, private, federal, state, and local contacts (Appendix D) that are to be notified at various phases during the activation of the Plan. The Level 1, Level 2, and Level 3 *Immediate Action Plans* and the *Response Flow Diagrams*, contained in Appendices B and C, indicate when certain entities are to be contacted in the event of activation of this Plan. Northwind will contact, by telephone, all potentially affected parties as well as state and local response organizations if the H_2S Plan is activated. All entities contacted will be advised of the following:

- The nature, location, and extent of the release/emergency at the Facility, Booster Station or Pipeline, and recommendations for protective actions such as evacuation or shelter-in-place orders
- Any other event-specific information that is necessary to protect the public
- Updated status of the release and continued safety measures to be taken, including but not limited to, when to evacuate and/or when it is safe to return to the area

In the event of activation of the Plan, in addition to notifying individuals, businesses, and operators (listed in Appendix D), Northwind on-site personnel, as designated by the IC, will make a visual inspection of the potentially impacted area to ensure that no individuals are observed inside. If any are observed, they will be advised to immediately evacuate to a designated Emergency Evacuation Area.

4.3.2 *Media Site*

During all Level 2 and Level 3 events, a media site will be established adjacent to relevant assembly areas. The IC will designate a Media Site adjacent to each Emergency Assembly Area, which may be relocated should ambient environmental conditions become unsuitable. The IC will also designate an individual to assume the duties of Media Liaison Officer. Under no circumstances will media personnel be allowed inside the warm or hot zone (road blocked area). Media personnel will only be allowed inside the road blocked area once the area has been monitored and restored to a cold zone (i.e., less than 10 ppm H_2S) and the IC has approved their entry. Media personnel shall not be allowed to enter the property without the approval of the Northwind Plant Manager or his designee and shall be escorted by Northwind personnel at all times.

4.4 Location of Nearby Residences, Medical Facilities, Roads, Businesses, Public Receptors, and Producers

4.4.1 *Residencies and Medical Facilities*

There are no residencies and no medical facilities located within the 100-ppm Radius of Exposure (ROE) of the Plant. Upon activation of the Plan (see Appendix B for activation levels), the IC, or designee, shall notify all individuals within the 100-ppm ROE of the nature of the release and status of containment. Depending on the nature of the release and the prevailing wind conditions, individuals will be instructed to shelter in place or evacuate. Contact information for nearby residences can be found in Appendix D.

4.4.2 *Roads*

There are three public roads located within the 100-ppm ROE (Beckham Road, Frying Pan Road, Anthony Road). In the event of activation of this Plan, Titan Gas Treatment Plant personnel will be dispatched to establish roadblocks on these roads to prevent entrance into the ROE, depending on the response level as designated by the IC (see Figure 8). Roadblocks will be established at the designated locations regardless of wind direction in anticipation that variations in wind conditions can occur.

Beckham Road will have roadblocks designating the 500-ppm and 100-ppm ROE and emergency assembly areas, with alternate escape routes with roadblocks on Frying Pan Road. There are emergency trailers or equivalent vehicles equipped with flashing lights, windsocks and roadblock signs for use in alerting the public of hazardous conditions. Signs, warning of the potential presence of H_2S, will be installed where the 100-ppm ROE of the Plant intersect with the above referenced public roads. (See Figure 4 for the location of these signs; see Figure 10 for an example photograph of one of these signs).

4.4.3 *Businesses or Other Public Receptors*

There are two businesses within the 100-ppm ROE of the Plant; the location of these can be found in Figure 4 and contact information for the two businesses can be found in Appendix D.

4.4.4 *Producers*

There are five producers of active or permitted wells within the 100-ppm ROE for the treatment plant. Contact information for the producers is contained in Appendix D.

4.5 Evacuation Routes, Emergency Assembly Areas, and Roadblock Locations

4.5.1 *Evacuation Routes and Emergency Assembly Areas*

Figure 2 shows a plot of the Plant site, location of the AGI wells, and internal plant evacuation routes. Figures 3 and 4 shows the locations of Emergency Assembly Areas and recommended evacuation routes.

	**ATTENTION:** Notification of evacuation for all visitors and non-essential personnel shall begin with the 10 ppm H_2S control room alarm notification and activation of beacons within the Titan facility. (see Appendix B).

If the alarm persists, or ≥20 ppm H_2S is detected, the Responding Operator(s) are to don a 30-minute SCBA and first determine if any personnel are in distress and assist any distressed personnel to evacuate to Emergency Assembly Area 1. Emergency services (911) will be contacted if there are injuries or as otherwise deemed necessary. Responding operators, wearing the SCBAs, will then investigate the cause of the release.

At the sound of the evacuation alarm (amber beacons will be illuminated), all other personnel in the Plant are to stop work, check the prevailing wind direction (using visible windsocks) and immediately proceed along designated evacuation routes and/or upwind to the pre-designated Emergency Assembly Areas shown in Figure 4. Prevailing winds for the area are from the south-southwest.

Personnel should evacuate along the designated route unless that route is downwind of the release (based on the wind directions observed at the windsocks); in that event all evacuees should proceed along a route that is perpendicular to the release and then upwind to the designated Emergency Assembly Area.

Roll call shall be conducted at the Emergency Assembly Area to ensure all personnel (including contractors and visitors) are accounted for and have evacuated safely. The sign-in sheet will be used to make a full accounting of all personnel and visitors. At each Emergency Assembly Area, the ambient air quality will be monitored for H_2S concentration to ensure the area remains at less than 10 ppm. If the H_2S concentration rises to 10 ppm or greater, the assembly area will be relocated as detailed in the immediate action plan section of this document (see Appendix B).

4.5.2 *Roadblock Locations*

Pre-planned roadblock locations (to be utilized in the event of a Level 3 response) are shown on the ROE Map (Figure 4). Each location will have portable road barriers, flashing lights, and warning signs. The IC will designate representatives to staff each of the roadblocks. If deemed necessary by the IC,

the State or Local Police will be asked to assist with maintaining the roadblocks and directing traffic through alternate routes outside of the ROE.

4.6 Monitoring Equipment, Alarm Systems, Safety Equipment and Supplies

4.6.1 *Emergency Shut Down Systems*

[NMAC 19.15.11.12.D(1)]

The Titan Treatment Facility is equipped with an emergency shutdown (ESD) system at the Plant and AGI wells. The ESD system is a fail-safe hardwired system activated by push-button stations placed throughout the Plant (Figure 2). Operators in consultation with the IC will determine if an H_2S release situation warrants ESD of the plant. When activated, the ESD system is designed to perform the following actions through the use of a hardwired interface:

- Close all hydrocarbon inlet and outlet valves to and from the Plant and AGI Wells
- Initiate a distinct alarm and/or light which is separate from the general plant alarm
- Shut off fuel for all individual fuel uses
- Isolate Natural Gas Liquid (NGL) storage tanks and product pumps
- Shut down all electric motors (with exceptions such as lube oil pumps, flare blowers, instrument air compressors, etc.)
- Shut down rotating equipment (engine-driven equipment, expander/compressors, pumps, etc.)
- Isolate fuel to engine-driven equipment

The locations of the ESD buttons and Isolation Valves are shown in Figure 2. The ESD systems are designed to prevent a Level 2 and/or Level 3 response and can be automated or remotely activated via DCS or SCADA from the control room. Block valves on incoming lines can be remotely closed where they enter the Plant perimeter (see Figure 3). Additional isolating block valves outside the Plant perimeter on the incoming lines can be closed to prevent further gas flow into the Plant. The block valves furthest upstream can isolate the entire system from the field gathering lines coming into the Plant. At the discretion of the IC, operations personnel may be designated to close valves at field locations on inlet gas pipelines to ensure that incoming gas is shut off. Figure 11 shows the map of the sour gas pipeline which will feed the Plant with gas from a gathering system and the three compressor stations. The pipeline will be buried and conforms to all applicable NACE and DOT requirements. To mitigate against a possible Level 2 and/or Level 3 plan response, Operators will take prudent, proactive measures to ESD the plant as necessary. This includes the shutdown of the AGI compressors if H_2S sensors located within the AGI Well area go into high alarm (90 ppm). Furthermore, when AGI compressors are shut down either by the automated ESD or at the discretion of the IC, isolation valves upstream and downstream of the units will close as well as those located on the AGI wellhead.

	**ATTENTION:** The Plant ESD can be activated at any time in the Plant Control Room by the Titan Gas Treatment Plant operators and is to be activated if efforts to control the release have failed or if a catastrophic release has occurred.

4.7 Alarms, Visible Beacons, and Wind Indicators

Colored beacons, horns, wind direction indicators, and ESD stations are installed at various locations throughout the Plant (shown in Figure 2). At 10 ppm H_2S, all amber beacons within the Plant are illuminated and an audible alarm is initiated within the Control Room notifying the Control Room Operator. The facility-wide audible signal indicating an escalated H_2S emergency response within the plant are 4-second pulsating tones that sound at 20 ppm H_2S. Amber beacons remain illuminated throughout the Plant. The pulsating audible alarm will switch to a continuous tone (horn) when a concentration of 90 ppm H_2S or higher is detected, and full evacuation of the Plant will be initiated. As per NMAC 19.15.11.12.C, wind direction indicators which are visible both night and day are installed throughout the Plant (shown in Figure 2). At least one wind direction indicator can be seen from any location within the Plant as well as from any point on the perimeter of the Plant.

4.8 Signs and Markers

The Plant and AGI wells (contained totally within the Plant boundaries) have readily readable "warning", "caution" and "notice" signs which conform to the current ANSI standard Z535.1-2002 (Safety Color Code). These signs contain language warnings about the presence of H_2S/Poisonous Gas and high-pressure gas; they are posted at the Plant entrance and around the perimeter of the Plant and where isolation/block valves are located (see Figure 3). The signs are of sufficient size to be readable at a distance of 50 feet and contain the words "Caution Poison Gas". Emergency response phone numbers are also posted at the entrance to the Plant, and there are signs at the Plant entrance requiring that all visitors sign-in at the Plant office. Northwind does not have the authority to require individual operators who send gas to the Plant for processing to conform to OCD and/or Department of Transportation (DOT) regulations relative to placement of warning signs at individual wells or on gathering lines. It is the responsibility of these individual operators to conform to appropriate regulations and to certify compliance with those regulations to those regulating agencies, as required. Signs, warning of the potential presence of H_2S, will be installed where the 100 ppm ROE of the Plant intersect the above referenced public roads. (See Figure 4 for the location of these signs; and see Figure 10 for a sample photograph of one of these signs).

4.9 Emergency Equipment

4.9.1 *Emergency Trailers*

Emergency trailers or equivalent emergency vehicles, equipped with flashing lights and windsocks will be utilized at public roads to establish roadblocks (shown in Figure 4) to alert the public in the event of hazardous conditions. While local authorities will be notified of any plan activation requiring roadblocks (Level 3), it is the responsibility of the Titan Gas Treatment Plant response team to maintain and deploy the Emergency Trailers.

4.9.2 *First Aid Equipment*

First aid equipment is located in the Plant control room building (see Figure 3), Northwind vehicles, and at other strategic locations throughout the Plant.

4.10 Gas Detection Equipment

4.10.1 *Fixed Monitors*

The Titan Gas Treatment Plant has numerous fixed-point hydrogen sulfide detectors strategically placed throughout the Plant to detect possible leaks. The sensors are connected to the Control Room alarm panel's Programmable Logic Controllers (PLCs), and then to the Distributed Control System (DCS). Upon local detection of hydrogen sulfide at 10 ppm at any detector, visible amber beacons are activated, and an alarm (control room and/or Plant-wide) is sounded. Upon detection of hydrogen sulfide at 90 ppm at any detector, an evacuation alarm is sounded throughout the Plant at which time all personnel will proceed immediately to a designated evacuation area. The amber beacon is activated at 10 ppm. The plant-wide audible alarms (including AGI Well horns) are activated with repeating 4 second horn at 20 ppm and a continuous horn at 90 ppm.

The Plant will monitor the inlet gas stream and sweet gas stream concentrations of hydrogen sulfide via H_2S analyzers installed at various points across the facility, including near the AGI injection pumps.

The AGI system monitors can also be viewed on PLC displays located at the Plant and the locations of ambient H_2S sensors are shown on the plot plan (Figure 2). Immediate action is required for any alarm occurrence or malfunction. All H_2S sensors are calibrated monthly.

4.10.2 *Personal and Handheld H_2S Monitors*

All personnel working at the Plant wear required personal H_2S monitors, which alarm and vibrate when concentrations of 10 ppm H_2S are detected. Handheld gas detection monitors are available so that personnel can check specific areas and equipment prior to initiating maintenance or other work. The handheld gas detectors, at minimum, have sensors for oxygen, LEL (explosive hydrocarbon atmospheres), H_2S, and carbon dioxide (CO_2).

4.11 Respirators

The plant is equipped with six 30-minute SCBA respirators and cascade hose reel systems strategically located throughout the Plant (see Figure 2). The cascade hose reel systems have two to four compressed air cylinders hooked up in series to provide a sustained supply of breathing air for extended work time in a hazardous atmosphere. Each cylinder will supply one person with six to eight hours of breathing air at normal workloads or three hours at medium/heavy workloads. Several hose reels and masks may be attached to a cascade system. The system is equipped with a low-pressure alarm to allow workers to safely exit the hazardous area with plenty of reserve air capacity. All Plant personnel are trained and fit tested annually to use the SCBA respirators.

4.12 Process Purge System

All vessels, pumps, compression equipment, and piping in the acid gas injection process are designed and equipped to allow purging with pipeline quality gas to remove the acid gas prior to conducting maintenance or inspection work. The purge gas stream with residual acid gas is routed safely into the acid gas flares located at the plant. All flares are equipped with autoignition fuel assist devices in compliance with NMAC 19.15.11.11(D). See Figure 2 for location of flares. Operating procedures include the purging of all equipment to avoid acid gas exposure to personnel and to prevent acid gas from escaping to the environment.

4.13 Fire Fighting Equipment

The Plant is equipped with portable fire extinguishers that may be used in an emergency, and Plant personnel are trained only for incipient stage firefighting. The fire extinguishers are located throughout the Plant (see Figure 2), including process areas, compressor buildings, process buildings, and within company vehicles. The extinguishers present are typically a 20# dry chemical fire extinguisher.

5.0 Characteristics of Hydrogen Sulfide, Sulfur Dioxide, Carbon Dioxide

[NMAC 19.15.11.9.B(2)(b)]

5.1 Hydrogen Sulfide (H_2S)

H_2S is a colorless, toxic, and flammable gas with the odor of rotten eggs. It is heavier than air and presents a significant health hazard by paralyzing the respiratory system resulting in serious injury or death.

Table 1: Hydrogen Sulfide Properties and Characteristics

Hydrogen Sulfide Properties and Characteristics	
CAS No.	7783-06-4
Molecular Formula	H_2S
Molecular Weight	34.082 g/mol
Ceiling Concentration	20 ppm (OSHA)
Ceiling Peak Concentration	50 ppm (OSHA)
Threshold Limit Value (TLV)	15 ppm (ACGIH)
Time Weighted Average (TWA)	10 ppm (NIOSH)
Short Term Exposure Level (STEL)	15 ppm (ACGIH)
Immediately Dangerous to Life or Health (IDLH)	100 ppm
Specific Gravity Relative to Air (Air=1.0)	1.189
Boiling Point	-76.5F
Freezing Point	-121.8F
Vapor Pressure	396 psia
Auto-ignition Temperature	518F
Lower Flammability Limit	4.3%
Upper Flammability Limit	46.0%
Stability	Stable
pH in water	3
Corrosivity	Reacts with metals, plastics, tissues, and nerves

Physical Effects of Hydrogen Sulfide		
Concentration		**Physical Effects**
ppm	**%**	
1	0.00010	Can be smelled (rotten egg odor)
10	0.0010	Obvious and unpleasant odor; Permissible exposure level; safe for 8-hour exposure
20	0.0020	Acceptable ceiling concentration
15	.005	Short Term Exposure Limit (STEL); Safe for 15 minutes of exposure without respirator
50	0.0050	Loss of sense of smell in 15 minutes
100	0.0100	Immediately dangerous to life and health (IDLH) loss of sense of smell in 3-15 minutes; stinging in eyes and throat; Altered breathing
200	0.0200	Kills smell rapidly, stinging in eyes and throat
500	0.0500	Dizziness; Unconscious after short exposure; Need artificial respiration
700	0.0700	Unconscious quickly; death will result if not rescued promptly
1000	0.1000	Instant unconsciousness; followed by death within minutes

5.2 Sulfur Dioxide (SO_2)

Sulfur Dioxide is a by-product of H_2S combustion. The waste gas stream consisting of H_2S and CO_2 is routed to the plant acid gas flare during abnormal conditions when the acid gas injection equipment is out of service. Waste gas is also routed to the acid gas flare during maintenance operations that require equipment to be blown down.

Sulfur Dioxide is colorless, transparent, and non-flammable gas with a pungent odor associated with burning sulfur. SO_2 is heavier than air but can be picked up by a breeze and carried downwind at elevated temperatures. It can be extremely irritating to the eyes and mucous membranes of the upper respiratory tract.

Table 2: Sulfur Dioxide Properties and Characteristics

Sulfur Dioxide Properties and Characteristics	
CAS No.	7446-09-5
Molecular Formula	SO_2
Molecular Weight	64.07 g/mol
Permissible Exposure Limit (PEL)	5 ppm (OSHA)
Time Weighted Average (TWA)	2 ppm (ACGIH)
Short Term Exposure Level (STEL)	5 ppm (ACGIH)
Immediately Dangerous to Life and Health (IDLH)	100 ppm
Specific Gravity Relative to Air (Air = 1.0)	2.26
Boiling Point	14°F
Freezing Point	-103.9°F
Vapor Pressure	49.1 psia
Auto-ignition Temperature	N/A
Lower Flammability Limit	N/A
Upper Flammability Limit	N/A
Stability	Stable
Corrosivity	Could form an acid rain in aqueous solutions

Physical Effects of Sulfur Dioxide	
Concentration (ppm)	**Physical Effects**
1	Pungent odor, may cause respiratory changes
2	Permissible exposure limit; Safe for an 8-hour exposure
3-5	Pungent odor; normally a person can detect SO_2 in this range
5	Short Term Exposure Limit (STEL); Safe for 15 minutes of exposure
12	Throat irritation, coughing, chest constriction, eyes tear and burn
100	Immediately Dangerous to Life and Health (IDLH)
150	Severely irritating; May only be endured for a few minutes
500	Causes a sense of suffocation, even with first breath
1,000	Death may result unless rescued promptly

5.3 Carbon Dioxide (CO_2)

Carbon Dioxide is a colorless, odorless, and non-flammable gas that is heavier than air. At concentrations above 10% CO_2 can cause asphyxiation with prolonged exposure.

Table 3: Hydrogen Sulfide Properties and Characteristics

Carbon Dioxide Properties and Characteristics	
CAS No.	124-38-9
Molecular Formula	CO_2
Molecular Weight	44.010 g/mol
Time Weighted Average (TWA)	5,000 ppm
Short Term Exposure Level (STEL)	30,000 ppm
Immediately Dangerous to Life and Health (IDLH)	40,000 ppm
Specific Gravity Relative to Air (Air = 1.0)	1.5197
Boiling Point	-109.12°F
Freezing Point	-109.12°F
Vapor Pressure	830 psia
Auto-ignition Temperature	N/A
Lower Flammability Limit	N/A
Upper Flammability Limit	N/A
Stability	Stable
Corrosivity	Dry gas is relatively inert and non-corrosive; can be corrosive to mild steels in aqueous solutions

Physical Effects of Carbon Dioxide	
Concentration (%)	**Physical Effects**
1.0	Breathing rate increases slightly
2.0	Breathing rate increases to 50% above normal level. Prolonged exposure can cause headache, tiredness
3.0	Breathing rate increases to twice normal rate and becomes labored. Weak narcotic effect. Impaired hearing, headache, increased blood pressure and pulse rate
4.0 - 5.0	Breathing increases to approximately four times normal rate, symptoms of intoxication become evident, and slight choking may be felt
5.0 – 10.0	Characteristic sharp odor noticeable. Very labored breathing, headache, visual impairment, and ringing in the ears. Judgement may be impaired, followed within minutes by loss of consciousness
10.0 -100.0	Unconsciousness occurs more rapidly above 10% level. Prolonged exposure to high concentrations may eventually result in death from asphyxiation

6.0 Radii of Exposure

[NMAC 19.15.11.7.K]

6.1 Worst Case Scenarios

See Appendix E for actual ROE calculations. The basis for worst case scenario calculations are as follows:

- The worst-case ROE for this Plan has been calculated utilizing the inlet and TAG flow rates (24-hour rate) and composition expected for the Plant, which is 200 MMSCFD. The ROE calculation in this Plan utilizes that inlet flow rate and an H_2S concentration for inlet gas of 1.5 mole percent. The calculated ROEs for the inlet gas are shown in the calculations in Appendix E.
- The worst-case scenario ROE assumes an uncontrolled instantaneous release of a 24-hour volume of gas at the Plant. Because the Plant is a throughput process plant, it is impossible that the entire 24-hour throughput volume of the Plant could be released instantaneously as is assumed in the worst-case scenario calculations of the ROE. Further, the Plant's ESD systems would be activated in the event of a catastrophic emergency and would prevent the flow of gas into the Plant and would isolate the AGI compressors and equipment and route the acid gas safely to the Plant acid gas flare. To comply with NMAC 19.15.11, the worst-case scenario calculations (assuming an instantaneous release of the 24-hour processing and/or TAG volume) are utilized here.

The formulas utilized in calculating the radius of exposure (ROE) are as follows:

- **100 ppm ROE Calculation (as per NMAC 19.15.11.7.K.1):**
  X= [(1.589)(hydrogen sulfide concentration)(Q)](0.6258)
- **500 ppm ROE Calculation (as per NMAC 19.15.11.7.K.1):**
  X= [(0.4546)(hydrogen sulfide concentration)(Q)](0.6258)

Where:

X	= Radius of exposure in feet
hydrogen sulfide concentration	= The decimal equivalent of the mole or volume fraction of hydrogen sulfide in the gaseous mixture
Q	= Escape rate expressed in cubic feet per day (corrected for standard conditions of 14.73 psi absolute and 60 degrees Fahrenheit)

ROE for Titan Gas Treatment Plant worst-case-scenario:

100 ppm ROE = 2.86 miles
500 ppm ROE = 1.31 miles

The ROE for the Plant and AGI Well are shown in Figure 4. This ROE Pattern is designed to include the 100 ppm and 500 ppm radii for a potential worst-case failure at any point in the system.

7.0 Facility Description, Maps, and Drawings

[NMAC 19.15.11.9.B(2)(C)]

7.1 Description of Plant Operations and AGI Wells

The Plant and AGI wells, when in operation, will be manned 24-hours-a-day, 7-days-a week. Plant operations include compression and treatment. The Plant gathers produced natural gas from Lea County, New Mexico. Once gathered at the Plant, the produced natural gas is compressed to remove the water content. The inlet gathering lines and pipelines that bring gas into the plant are regulated by DOT, NACE and other applicable standards which require that they be constructed and marked with appropriate warning signs along their respective rights-of-way.

Figure 2 shows the major process units and all major process equipment used to transport and treat sour gas. Because the natural gas that is gathered at the Plant contains H_2S (sour gas), it must be treated to remove these and other impurities. Low pressure gas from the gathering system is collected at the facility in a low-pressure slug catcher at 450 psig. Using three-stage compressors from either the

Flight, Siege, or Pelican Booster Stations, the sour gas is compressed to 1,000 psig and treated to remove H_2S and CO_2 with a 2,750 GPM amine unit. The treated high-pressure gas is metered as it is transported to a takeaway pipeline. Condensates collected in the low-pressure slug catcher are routed to a condensate surge vessel. Using a two-tower stabilization unit, the natural gas liquids are separated out of the condensate. Both the condensate and the natural gas liquids are stored onsite prior to transportation away from the facility via truck or pipe. The condensate and natural gas liquids in the storage vessels will have much lower concentrations of H_2S, however, any stairs or ladders leading to the top of the vessels will be chained or marked to restrict entry pursuant to NMAC 19.15.11.12.E.

Because the natural gas that is gathered and processed at the Plant contains H_2S ("sour gas"), it must be treated or processed to remove these and other impurities. The CO_2 and H_2S stream that is removed from the natural gas in the amine treating process is compressed up to approximately 1,400 psig. Water vapor contained in the gas stream is removed during compression and cooling. It is sent to a 500 BBL process water tank for truck load out. The compressed acid gas is transported via an underground corrosion-resistant stainless-steel pipe, to the AGI well where it will be injected into the Bell Canyon and Cherry Canyon formation (approximately 5,480-7,040 feet). H_2S sensors are located at critical junctions along the pipe, which will be racked over short distances near connections with the compressor and the wellhead. The pressure in the pipe is monitored continuously so that the acid gas injection process could be stopped—should there be any unusual variations in pressure.

The Salt Creek AGI #3 well (30-025-51865) is an integral component of the Titan Gas Treatment Plant design. It is constructed using the materials depicted in Figure 5 and the general schematic of the whole AGI system is shown in Figure 7. The plugged and abandoned Salt Creek AGI #1 (30-025-46746) is located on the treatment facility property. This well was drilled to TD in 2022 and subsequently plugged and abandoned in May 2023. The schematic of plugging operations is detailed within Figure 6. The AGI #3 well was constructed utilizing five strings of casing, with the first and second extending 1,277 and 2,438 feet, respectively, to protect all usable groundwater in overlying strata. The intermediate casing strings are set at 3,100 and 5,110 feet and production casing was installed to a total depth of 7,040 feet Each string of the telescoping casing is cemented to the surface and the AGI well design includes installation of a "downhole" subsurface safety valve (SSV) which is located approximately 100 feet below the surface on the production tubing to assure that fluid cannot flow back out of the well in the event of a failure of the injection equipment. In addition, the annular space between the production tubing and the production casing are filled with corrosion-inhibited diesel fuel (an inert fluid) as a further safety measure, which is consistent with previous NMOCD-approved well designs for acid gas injection.

Per National Association of Corrosion Engineers (NACE) specifications, downhole components including the SSV and packer are constructed of corrosion resistant alloys (CRA). Basal joints in the CRA casing and joints in the tubing are also constructed of CRA materials. The gates, bonnets, and valve stems within the Christmas tree are CRA materials as well. The rest of the Christmas tree is made of standard carbon steel components and outfitted with annular pressure gauges that remotely report operating pressure conditions in real time to a gas control center. Pursuant to NMAC 19.15.11.12.D(2), in the event of abnormal pressures or any other situation requiring immediate action, the acid gas injection process can be stopped at the compressor, and the wellhead can be shut-in using a pneumatic wing valve on the Christmas tree. The Plant operator or IC may also shut the SSV on site or remotely. In addition, the injection tubing has profile nipples which provide the ability to insert a blanking plug into the base of the well below the packer, which would allow for the safe reentry into the well if needed. These safety devices provide for downhole accessibility and reentry under pressure for permanent well control. The SSV provides a redundant safety feature to shut-in the well in case the wing valves do not close properly (see Figures 5 and 7). All the control equipment on the well is designed and constructed in a manner such that under a worst-case scenario, the well can be safely reentered under pressure to obtain permanent well control consistent with NMAC 19.15.11.12.D(2). Additionally, well control equipment is fully integrated into the Plant control system, such that any emergency shutdown of plant operations will trigger the activation of these components and isolate the well at the surface and approximately 100 feet below the surface.

7.2 Maps and Figures

Figure 1 shows the location of the Titan Gas Treatment Plant. The plot plan of the Plant is the base for Figures 2 and 3 and show the locations of safety equipment and emergency evacuation routes at the plant. Figure 4 shows the 100 and 500 ppm ROE, escape routes, roadblock locations, emergency assembly areas and locations of H_2S warning signs. The design schematic of the AGI well is shown in Figure 5, the schematic of the plugged AGI well located at the facilities is shown in Figure 6, and the schematic of the active AGI well's tie-in to the Titan Gas Treatment Plant is shown in Figure 7. Figure 8 is the Incident Command Structure and Figure 9 is the detailed Incident Command Structure. Figure 10 is an example of an H_2S warning sign that will be placed immediately outside the radius of exposure from the Plant.

Figure 11 shows the locations of the gas gathering lines that feed the Plant. Per the request of NMOCD, Northwind will notify all operators that feed the gathering line that they may be subject to additional oversight and H_2S regulation regarding sour gas operations.

8.0 Training and Drills

[NMAC 19.15.11.9.B(2)(D)], [API RP-55 7.4D]

Northwind will conduct annual training for its own personnel as well as for the public and emergency responders as detailed below. Training will include:

- Characteristics of H_2S safety precautions
- An overview of the Titan Plant, AGI Operations, Booster Stations and Pipeline operations
- A review of their roles in responding to activation of the Titan Plant H_2S Contingency Plan
- Location of the ROE and how to protect the public within the radii of exposure.
- Potential roadblock locations, potential evacuation routes, and how they can assist in implementing the Plan.

8.1 Training of Essential Personnel

Annual training for Northwind personnel shall include plant and pipeline operators, mechanics, instrument and electrical technicians, and maintenance support personnel. Plant Operators will be responsible for initiating and implementing the H_2S Contingency Plan. In addition, all Northwind personnel will receive:

- H_2S Contingency Plan Training: This annual training will include a review of all aspects of the Plan and will include, at minimum, one tabletop drill involving activation of the Plan.
- Plant, Compressor Station, and Pipeline Orientation Training: All Northwind personnel, visitors, and contractors must attend an overview orientation prior to obtaining permission to enter the Plant, Compressor Station, or Pipeline ROW.
  - A refresher course on this training is required annually for all people. Included as part of this orientation is how to respond and evacuate safely in the event of an H_2S alarm or release. This training also complies with the requirements of Northwind and its Plant Process Safety Management Program and Procedures Manuals.
- All Northwind field personnel are also trained annually on the Corporate Emergency Response Plan.
- H_2S and SO_2 training: All Northwind personnel must be H_2S certified and must also receive annual refresher training on H_2S and SO_2, which is conducted by accredited Northwind personnel. Individuals must maintain their H_2S certification to work at the Plant, Compressor Station, or Pipeline ROW.
  - If an individual is unable to attend, they may be required to attend a third-party training session from an outside provider. All contract employees are required to have had H_2S training and to provide the Plant with a copy of their certification card prior to obtaining permission to enter the Plant, Compressor Station, or Pipeline ROW.
- Respirators: all Northwind personnel are trained annually on the proper use of respirators. In addition to the annual training, all Northwind personnel are fit-tested annually on the respirators. All Northwind personnel must have medical clearance for respirator use.

- Hazard Communication: all Plant personnel are trained annually on Hazard Communication. The annual training includes, at minimum, the use of material safety data sheets (MSDS) for those materials that are present at the Plant.
- Personal Protective Equipment (PPE): all personnel are trained annually on the Northwind requirements for PPE. The training includes, at minimum, a review of all the types and levels of PPE and how to select the correct equipment for the job.

8.2 On-Site or Classroom Emergency Response Drills

- Northwind will conduct, at least, a tabletop drill annually, and multiple drills during the year may be scheduled at the discretion of the Plant Manager
- The annual drill will execute this Plan and include, at minimum, the Public Officials and Local Emergency Response Agencies listed in Section 8.4 below
- Annual training will also include contacting the interested parties, including all entities that have been identified as being within the 500 ppm and 100 ppm ROE (Appendix E) to ensure contact information for them is current. Appendix D will be verified and updated annually by Northwind to be sure any changes of occupancy, ownership, or new commercial and/or residential buildings are reflected, and all owners/occupants receive training on protective measures
- The drills will also include briefing of public officials on issues such as evacuation or shelter-in- place plans

8.3 Notification and Training of Procedures Located within the ROE

Northwind will provide annual training to the producers listed in Appendix C that includes:

- An overview of Compressor Station and Pipeline operations
- Design and operating safety features of the facilities
- A review of the H_2S alarms and significance
- Notification procedures
- Roadblock locations
- Potential evacuation routes
- Procedures for sheltering in place
- Radii of exposure

8.4 Training of Public Officials and Emergency Response Agencies

All the Emergency Response Agencies listed in Appendix C will have copies of the H_2S Contingency Plan and will receive training from qualified Northwind personnel:

- Jal Emergency Medical Services – Fire, Police, Ambulance
- Jal City Manager
- Hobbs Emergency Medical Services – Fire, Police, Ambulance
- Lea County 911 emergency response
- Lea County Emergency Planning Committee
- Lea County Sheriff's Department
- NMOCD – Hobbs District Office
- NM State Police – Hobbs, NM Office

Training for emergency response agencies will include:

- An overview of the Compressor Station and Pipeline operations
- Design and operating safety features on the facilities
- A review of the H_2S alarms and significance
- Notification procedures
- Roadblock locations
- Potential evacuation routes
- Procedures for sheltering in place
- Radii of exposure

Northwind will also conduct, at minimum, one annual tabletop drill involving the emergency response organizations listed above on the activation of the H_2S Contingency Plan.

8.5 Training and Attendance Documentation

Pursuant to NMAC 19.15.11.9(B)2(D), drills and training pertaining to the Plant, Pipeline, and Compressor Station will be documented by plant personnel, and those records shall be maintained for a minimum of five (5) years at the Plant and will be made available to a NMOCD representative upon request.

Training documentation shall include at minimum the following:

- Description of the training or scope of the drill
- Attendees and Participants in the training or drill
- Summary of the activities and/or responses
- Post-drill debriefing and reviews

9.0 Coordination with State Emergency Plans

[NMAC 19.15.11.9.B(2)(E)]

9.1 Notifications and Reports

Northwind has various notification and reporting obligations. Some are related to its state air quality permit that is overseen by NMED as well as state and federal spill reporting obligations. In addition to the regulatory obligations noted above, Northwind personnel also have internal and external notification and reporting obligations associated with the activation of this Plan at Level 3, in which a Potentially Hazardous Volume (PHV) is released. Reporting obligations are as follows:

9.1.1 *New Mexico Oil Conservation Division (NMOCD)*

[NMAC 19.15.11.16]

As soon as possible, but no later than four hours after plan activation, (recognizing that a prompt response should supersede notification), OCD will be notified by the IC or the IC's designee via email or fax to the District I Office of the activation of the H_2S Contingency Plan. In the event of a power failure, a phone call will be made within four hours. A full report of the incident to the OCD, utilizing Form C-141 shall be made no later than 15 days following the release, if greater than 20 MSCFD (see Appendix H).

9.1.2 *New Mexico State Police/ New Mexico Hazardous Materials Emergency Response Plan*

The New Mexico State Police will only be notified for a Level 3 plan activation. They have authority to take control of the scene management and coordination of all resources, though limited availability of personnel may inhibit any intervention. Should the State Police assume control, a designated Emergency Response Officer (ERO) will establish the National Interagency Incident Management System (NIIMS) Incident Command System (ICS) as the Incident Commander (IC) and be responsible for management of all response resources on scene. Off-scene coordination of response resources will be handled through designated Headquarters Emergency Response Officers. Law enforcement-related activities will be coordinated by State Police if necessary.

10.0 Plan Activation Levels

[NMAC 19.15.11.9.C], [API RP-55 7.4 D]

10.1 Activation Levels

Northwind commits to implement this Plan in response to the three activation thresholds that are described in the Immediate Action Plan and Response Flow Diagrams in Appendices B and C.

Level 1 Detection of H_2S at 10 ppm or greater will initiate a control room alarm and illumination of all amber beacons.

Detection of H_2S at ≥20 ppm activates the audible plant alarm (4 second pulsing horn); Amber beacons remain activated. (See Appendices B and C: Level 1 for details)

Level 2 Level 1 response unsuccessful. Constant facility-wide siren sounded, and amber beacons activated for H_2S ≥ 90 ppm. Notification of operators, businesses, and the public initiated (See Appendices B and C: Level 2 for details)

Level 3 Level 2 response unsuccessful. Catastrophic release; fire; explosion, a continuous release of maximum volume for 24 hours; or Rule 11 mandatory activation for a PHV, in which 100 ppm in any defined public area; 500 ppm at any public road; or 100 ppm at a distance greater than 3000 feet from the site of the release (See Appendices B and C: Level 3 for details)

As soon as the Plan has been activated based on the criteria above, the plant manager or their designee, will be notified.

10.2 Events That May Lead to a Release of H_2S

- Inlet and plant piping failure
- Amine still failure
- Flange/gasket leaks on inlet and plant piping
- Flange/gasket leak on the acid gas compressors
- Flange/gasket or valve packing leak at the AGI well or associated piping
- Valve packing failure
- Seal failure on acid gas compressors
- Failure of flare to ignite during plant emergency blow down
- Damage to AGI wellhead

11.0 Submission of H_2S Contingency Plans

[NMAC 19.15.11.9.D]

Northwind has submitted this H_2S Contingency Plan to the NMOCD for review and approval in November 2023. Northwind shall maintain a copy of the contingency plan at their corporate office. The plan as approved by the NMOCD will be readily accessible for review by the OCD at the facility upon request.

11.1 Revisions to the Plan

The H_2S Plan will be reviewed annually and revised at that time as necessary to address changes to the Plant facilities, operations, or training requirements, contact information and the public areas including roads, businesses, or residents potentially affected by the operations of the Plant and AGI well, specifically, those within the radii of exposure.

11.2 Annual Inventory of Contingency Plans

Northwind Midstream will file an annual inventory of wells, facilities, and operations for which H_2S Contingency Plans are on file with the NMOCD with the appropriate Local Emergency Planning Committee (LEPC) and the State Emergency Response Commission as per NMAC 19.15.11.9H. The inventory shall include the name, address, telephone number, and point of contact for all operations for plans on file.

12.0 Plan Figures

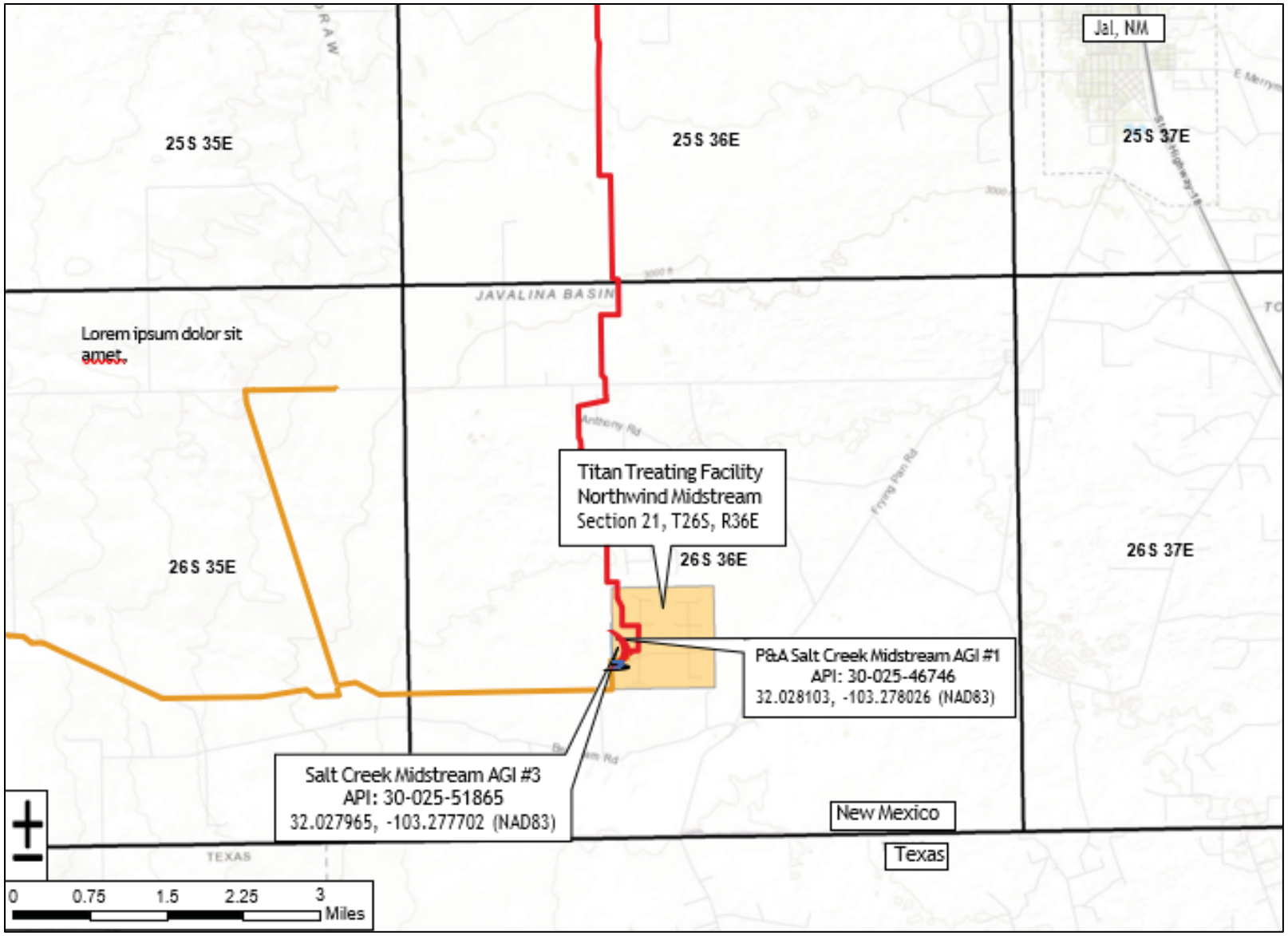


Figure 1. *General location map illustrating the surface lands occupied by the Titan Treating Facility (located approximately 7.7 miles southwest of Jal, New Mexico) and associated AGI well.*

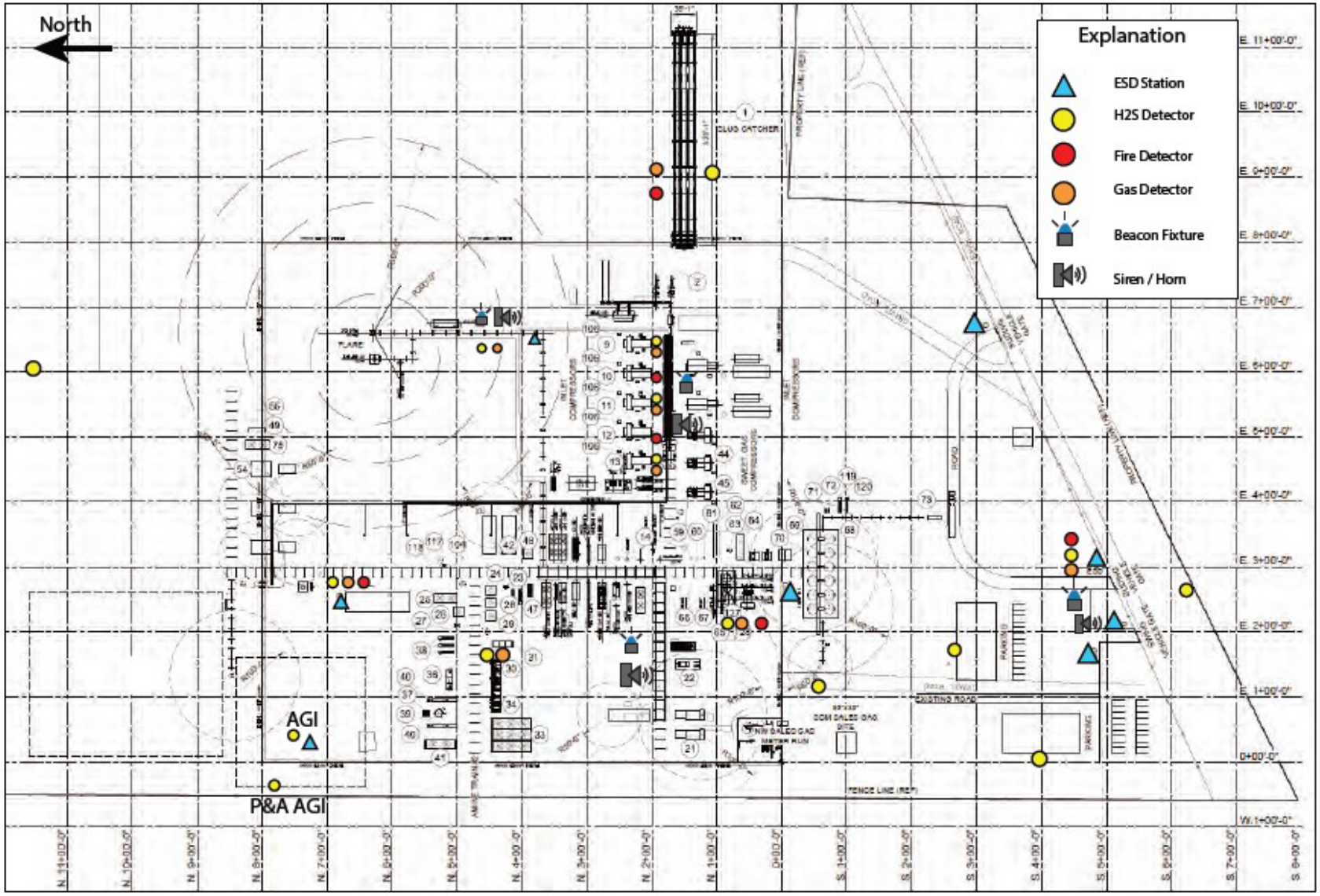


Figure 2. Detailed Titan Gas Treatment Plant schematic illustrating the location of emergency notification components such as, H_2S, gas, and fire detection sensors, sirens, and beacons.

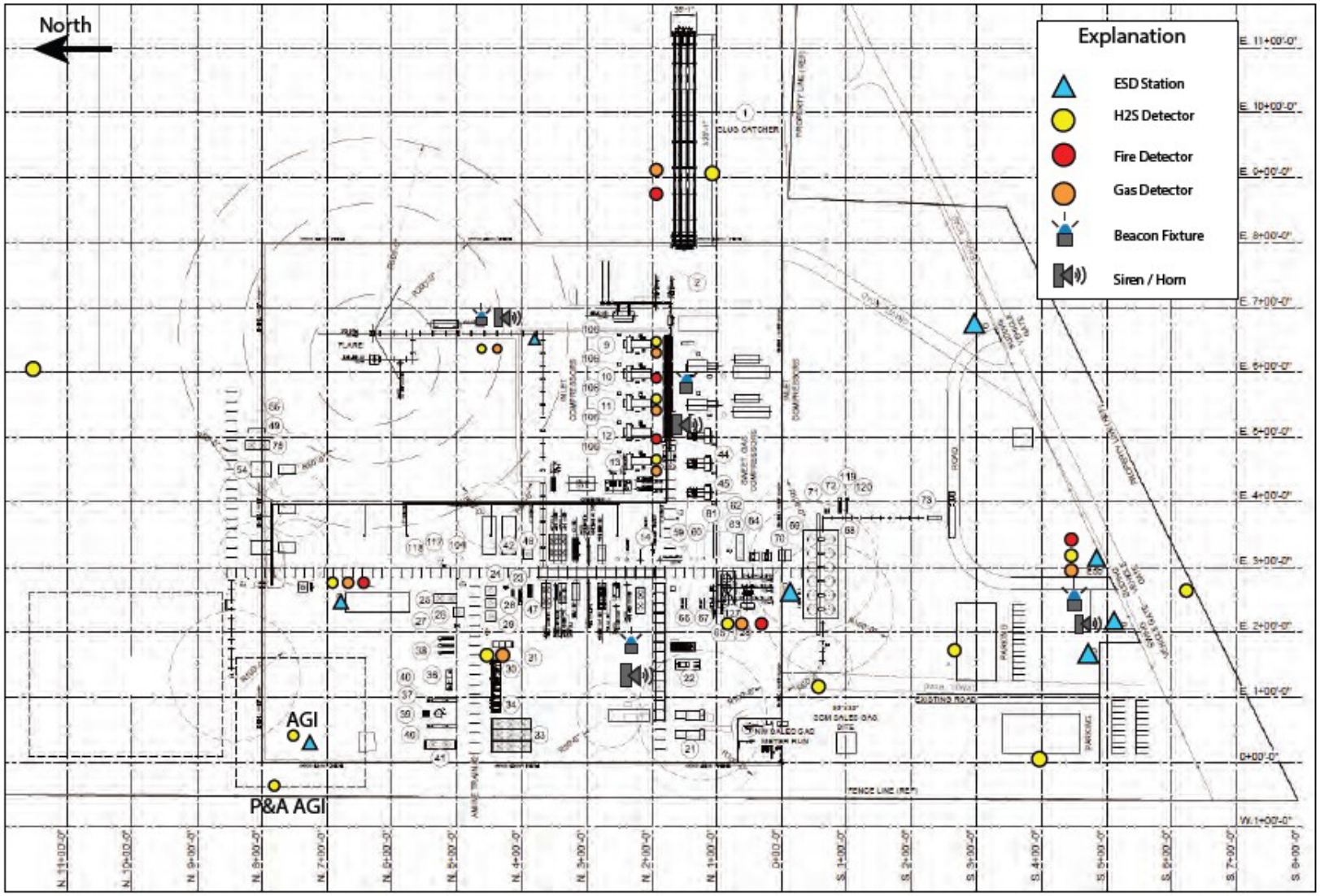


Figure 3. ***Detailed facility map illustrating evacuation routes, muster areas, exit gates, and locations of emergency equipment. Note: Optimal evacuation routed may vary depending on the location, nature, and environmental conditions at the time of the event. Predominant annual wind direction from the southwest.***

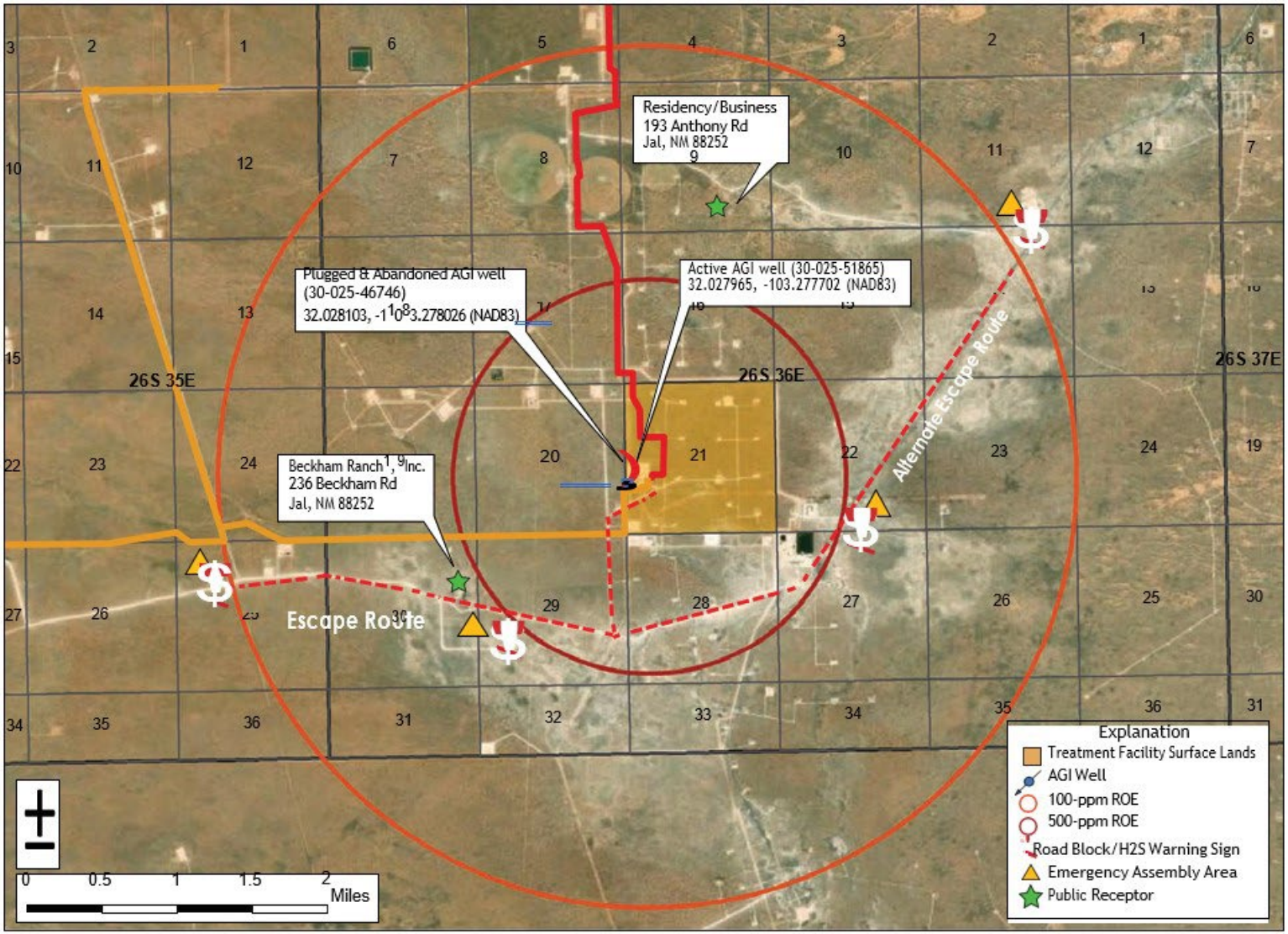


Figure 4. ***Worst-case-scenario radius of exposure map for the Titan Treatment Plant in the event of an unplanned release of H_2S. Roadblocks and emergency assembly areas are set along Beckham Rd and Frying Pan Rd, immediately outside of the 500-ppm ROE (1.31 mi) and the 100-ppm ROE (2.86 mi).***

NORTHWIND MIDSTREAM

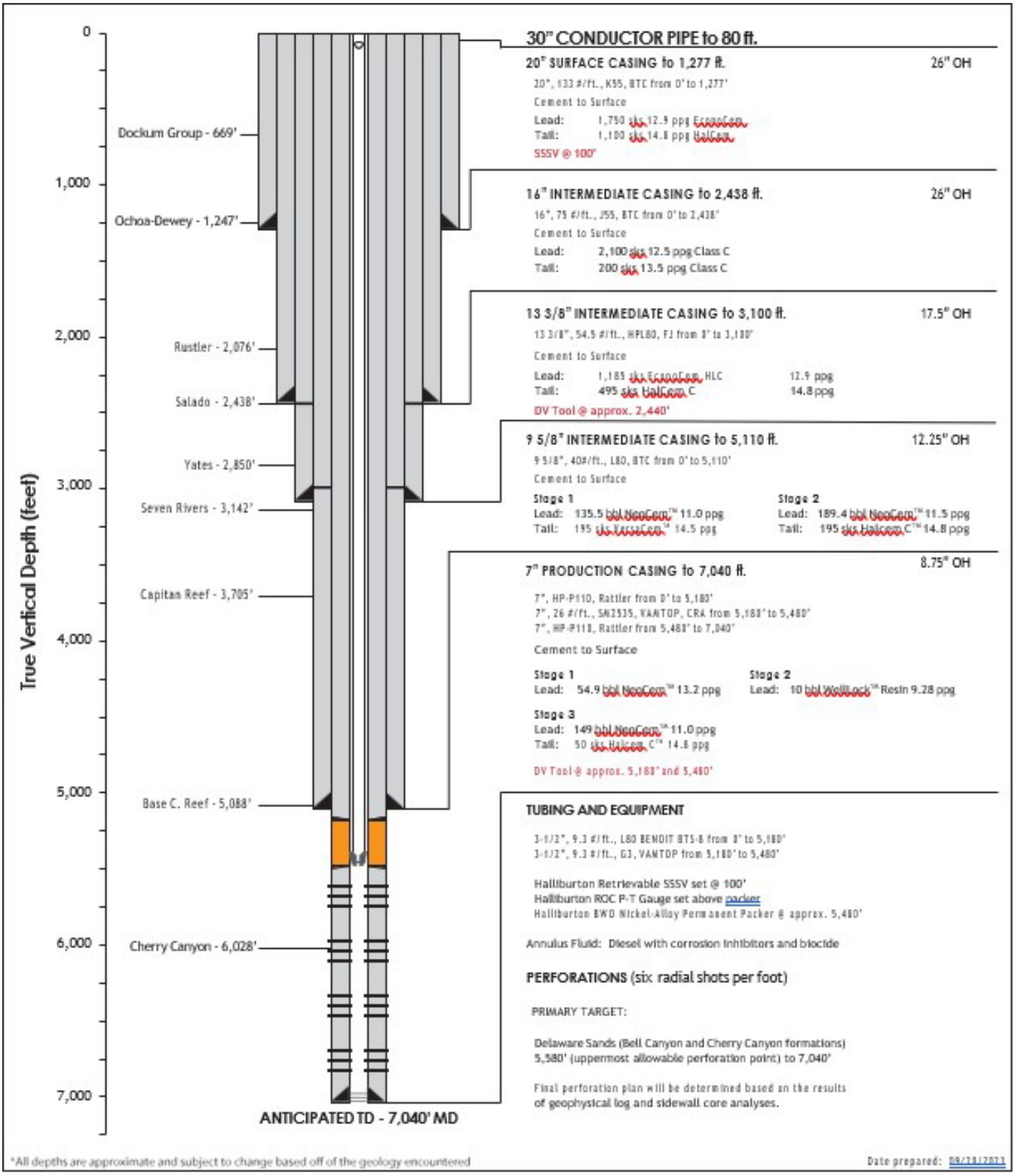


Figure 5. ***Revised wellbore schematic for Salt Creek AGI #3 developed in collaboration with NMOCD***

NORTHWIND MIDSTREAM

WELLBORE SCHEMATIC

Salt Creek Midstream
Salt Creek AGI #1
2370' FSL, 594' FWL
Sec. 21, T26S, R36E

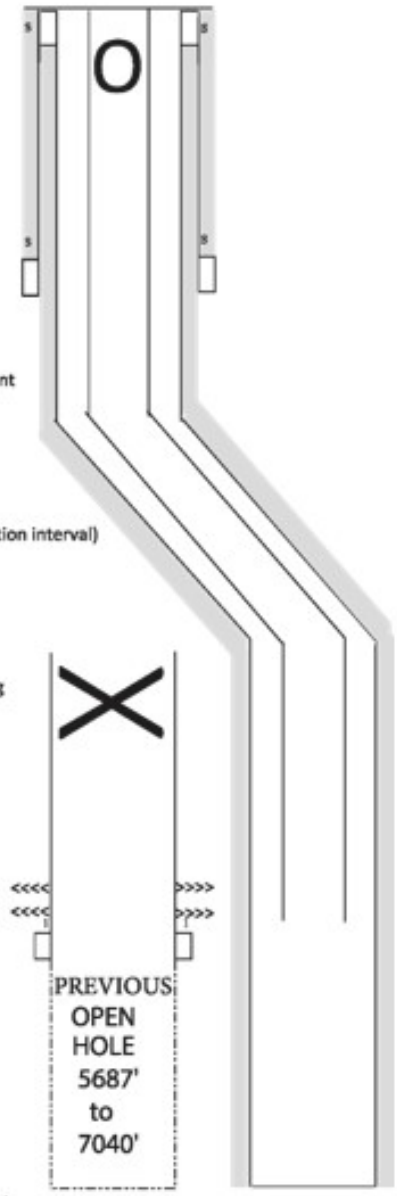
Surface - (Conven onal)
Hole Size: 12.25"
Casing: 9.625" - 40# J-55 BTC Casing
Depth Top: Surface
Depth Btm: 2100'
Cement: 670 sks Econocem w/5% Salt, 3# KOL Seal, 0.125Poly-E-Flake, .25# D-air, .2% HR-800
Cement Top: Surface (Circulated)

Production Csg #1 - (Cut Off)
Hole Size: 8.75"
Hole Depth: 7040'
Casing: 7.625" - 29.7# L-80 FJ x 7" 29# SM2535 VAMTOP
Depth Top: 3140'
Depth Btm: 5687'
ECP/DV Tool: 4200'
Cement: Stage 1 - CorrosaCem cement plug from 5680' - 7040'
Stage 2 - CorrosaCem cement "spot & squeeze" from 3140' - 5680' utilizing cement retainer set @ 3150' & perforations @ 5678'
Stage 3 - HalCem cement plug from 3140' - Surface Casing Shoe (Tied Back)

Production Csg #2 - (Side Track)
Hole Size: 8.75"
Hole Depth: 7040'
Casing: 7" - 29# HP-110 CDC HTQ x 7" 29# SM2535 VAMTOP (CRA csg above injection interval)
Depth Top: Surface
Depth Btm: 7040'
ECP/DV Tool: 3120'
ECP/DV Tool: 5554'
Cement: Stage 1 - CorrosaCem cement to surface
Stage 2 - Lead w/CorrosaCem, Tail w/Halliburton WellLock Resin across CRA csg
Stage 3 - HalCem cement to surface
Cement Top: Surface (Circulated)

Tubing - (Conventional)
Tbg Size: 3.5" 9.3# L80 BTS-8 x 3.5" 9.2# G3 VAMTOP
Tbg Depth: 5540'
Packer: Inconel 925 Permanent Packer w/PT guages
Accessories: PT guages @ 5520', SSSV @ less than 100'
Packer Fluid: Corrosion inhibited diesel

Perforations - (6 SPF - 60 deg phasing)
Top Shot: TBD'
Btm Shot: TBD'



To resolve the issue of stuck casing in the original wellbore, plugs were set in accordance with the table below.

CEMENT	TYPE/CLASS	# SACKS	YIELD (FT3/SK)	DENSITY (PPG)	TOP (FEET)	EST BASE (FT)
Plug #1	Halliburton CorrosaCem	600	1.221	14.5	5,720	7,040
Plug #2	Halliburton CorrosaCem	35	1.221	14.5	5,620	5,720
Plug #3*	Halliburton CorrosaCem	362	1.241	14.5	4,111	5,128
Plug #4*	Halliburton CorrosaCem	400	1.241	14.5	3,028	3,210
Plug #5	HalCem C "neat"	800	1.332	14.8	2,680	3,028
Plug #6	HalCem C w/ 1% CaCl2	800	1.332	14.8	2,064	2,680

Figure 6. Wellbore diagram schematic from Permian Oilfield Partners showing the proposed sidetrack design of the Salt Creek AGI #1 well (30-025-46746), located at the Titan Treatment Facility.

NORTHWIND MIDSTREAM

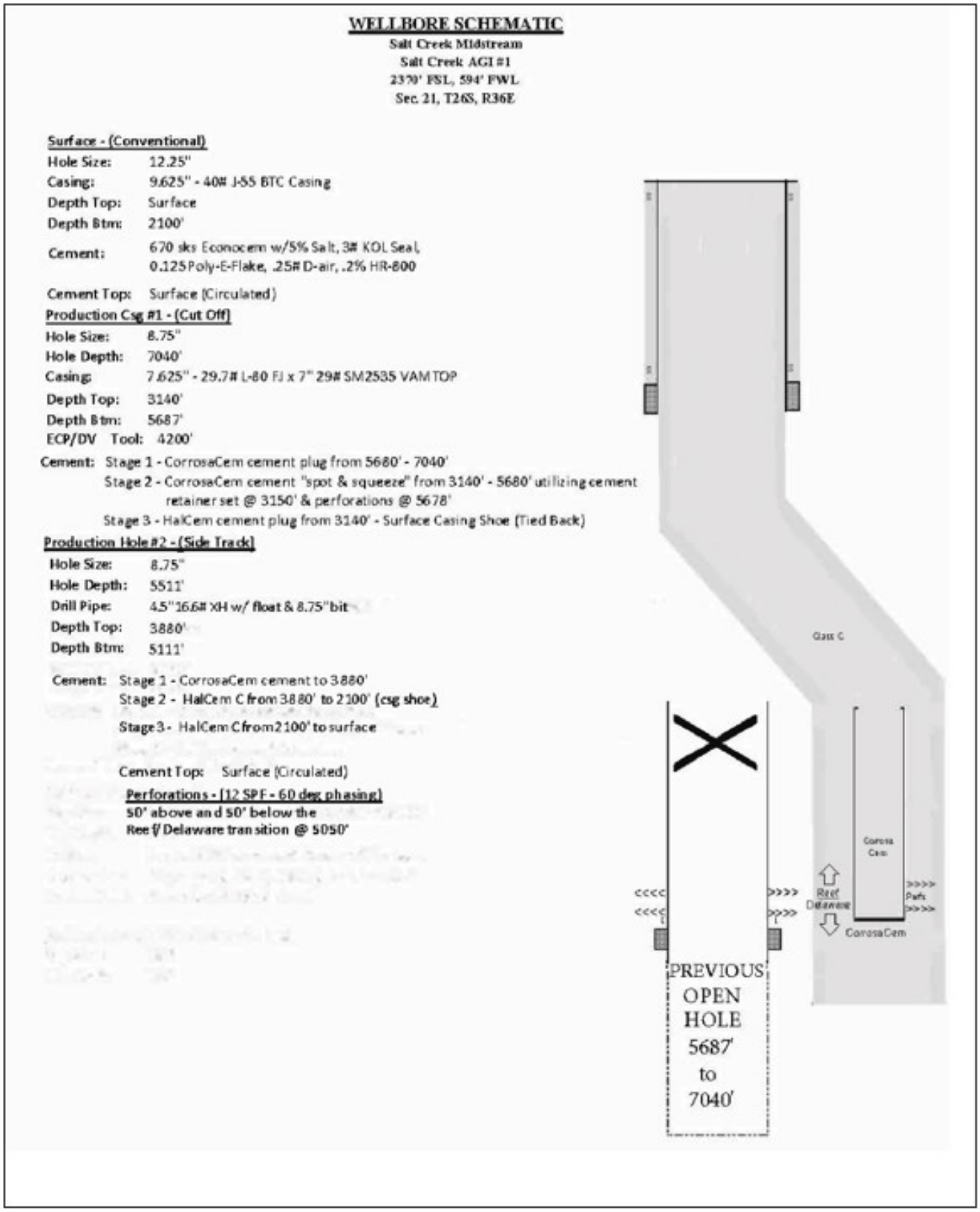


Figure 6 (continued). ***Wellbore diagram from Permian Oilfield Partners showing the plugged and abandoned Salt Creek AGI #1 well (30-025-46746).***

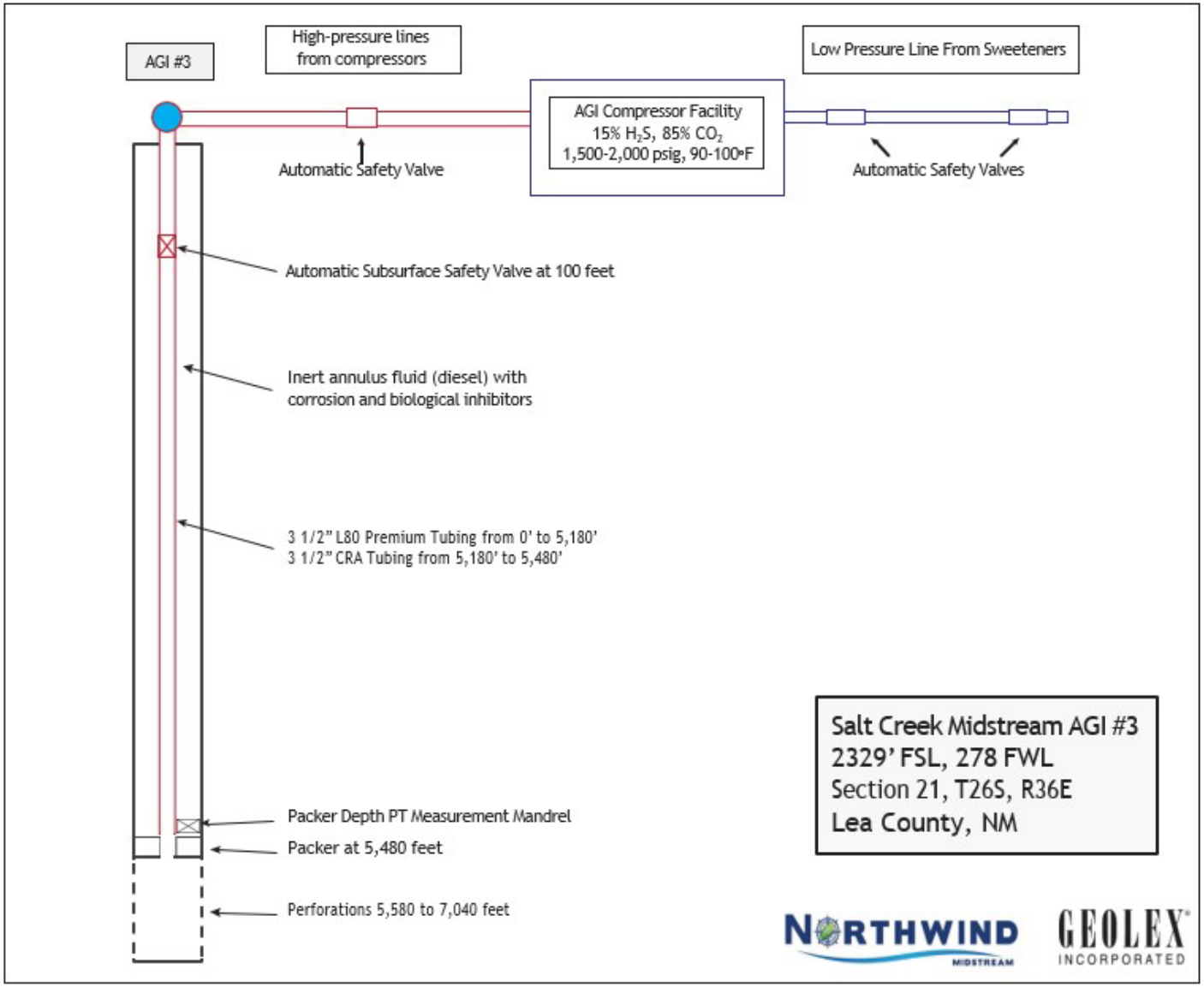


Figure 7. ***Schematic of surface facilities and Salt Creek AGI #3***

NORTHWIND MIDSTREAM

Titan Gas Treatment Facility Incident
Command System Structure: Duties and Responsibilities

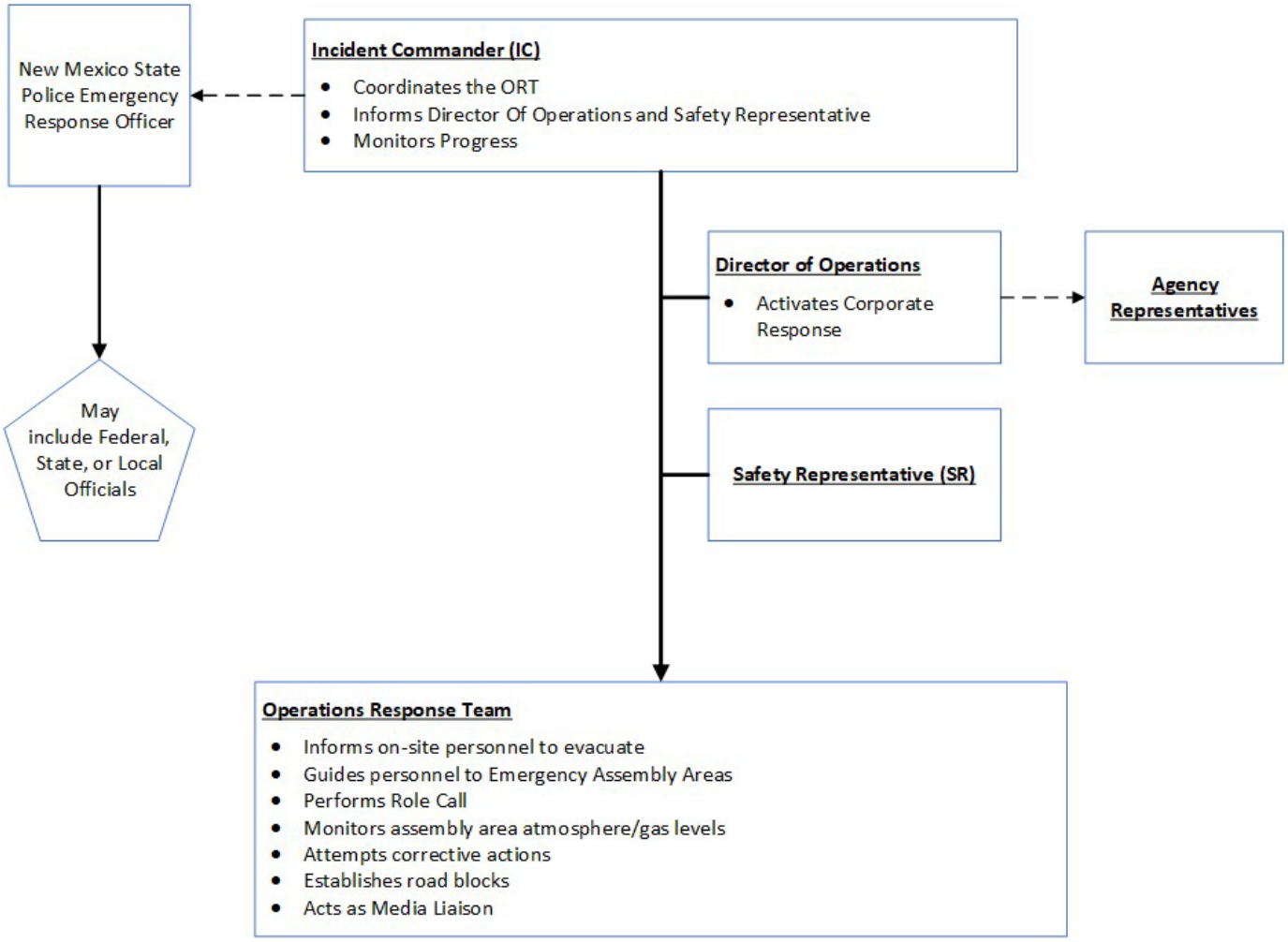


Figure 8. Incident Command System Structure for the Titan Gas Treatment Plant.

NORTHWIND MIDSTREAM

Titan Gas Treatment Facility
Detailed Incident Command System Structure

Name	Title	Phone Number
Alonzo Villalobos	Plant Manager	432-287-4033
Reagan Register	Director of Operations	432-250-5888
David Barton	Director of EHS&R	817-266-8865
Operations Response Team	Includes plant manager, plant/pipeline operators, and technicians	432-250-5888 432-287-4033
2 Individuals	Plant/Pipeline Operators	432-250-5888
Multiple	Maintenance Technicians	432-250-5888

Employee Information	Phone Number	Responsibilities amd Duties
Plant Manager: Alonzo Villalobos	432-287-4033	• Assumes role of Incident Commander (IC) Coordinates ORT (Plant operators and Technicians • Informs the Director of Operations and Safety Coordinator • Monitors Progress
Operators: Multiple contracted through "Midstream Operators"	432-250-5888	• Assumes Role in Operations Response Team (ORT) • Informs anyone on site to evacuate Guides individuals to Emergency Assembly • Areas Performs role call • Monitors assembly area gas levels Establishes roadblocks • Attempts corrective actions • Acts as media liaison
Maintenance Technicians: Multiple contracted through "Kodiak Gas Services"	432-250-5888	

Facility Main Office Phone Number	**432-250-5888**
Control Room Phone Number	**432-250-5888**

Figure 9. ***Detailed incident command Structure, responsibilities, and duties for the Titan Gas Treatment Plant for Northwind Midstream. All Operations Response Team personnel will be ready to perform any of the duties outlined in the table above, as directed by the Incident Commander. *Note: Facility is currently undergoing construction and staffing may change. Contact lists will be updated, as necessary, and will be provided to NMOCD and other interested parties.***

Figure 10. *An example of an H_2S warning sign placed at the treatment facility and critical junctures between public areas and the ROE.*

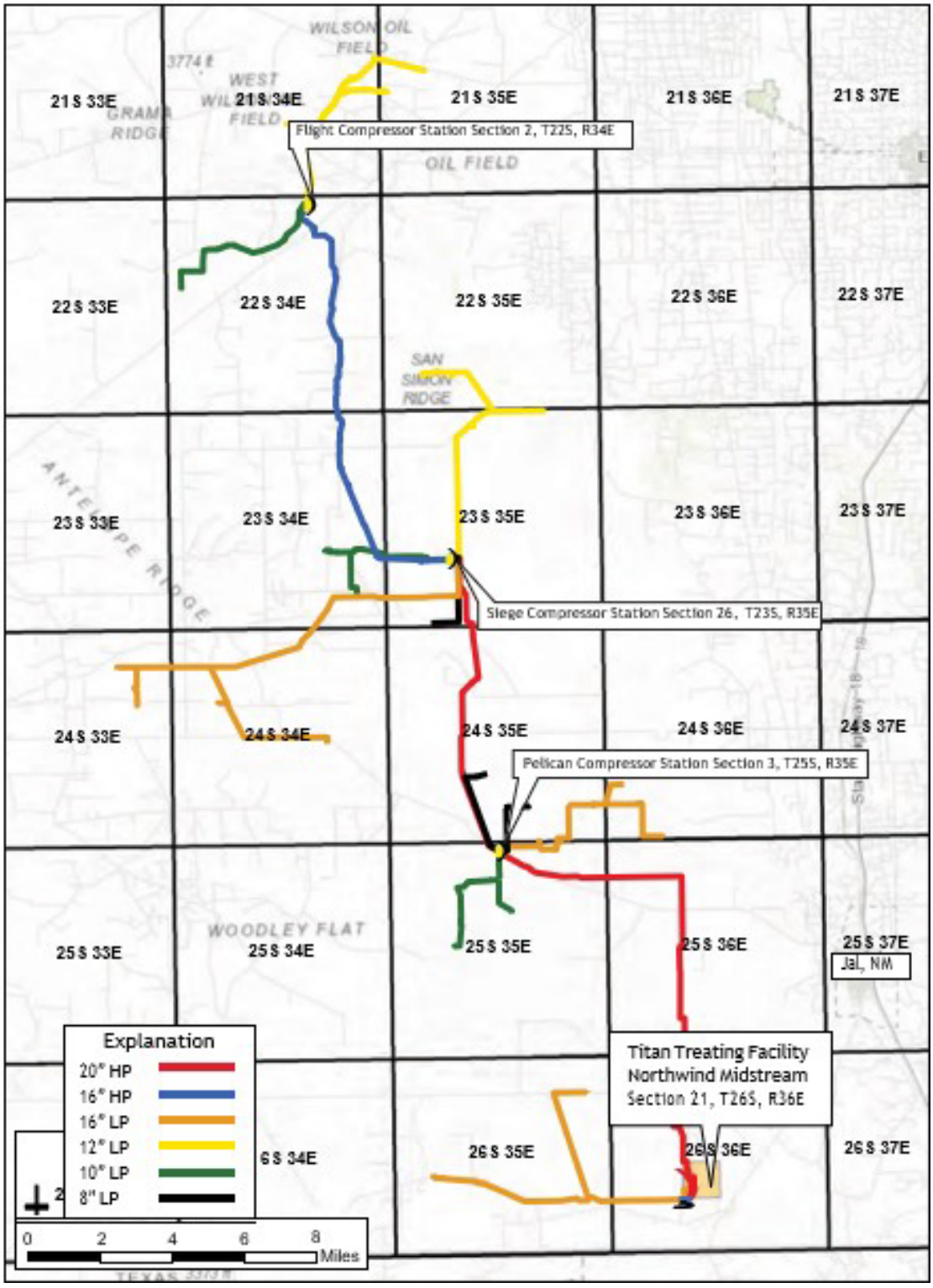


Figure 11. *Location of gas-gathering pipelines operated by Northwind Midstream and associated Compressor Stations with the Titan Treatment Facility.*

Appendix A Revision History

Version	Date	MOC #	Author	Summary of Change
1-0	05/01/2024	N/A	Geolex. Inc Northwind Midstream	Initial Issue

Appendix B Immediate Action Plans

LEVEL 1 ACTIVATION

ACTIVATING CONDITIONS:

- H_2S of 10 ppm or greater detected at any fixed monitor.

ALARMS AND AUTOMATED ACTIVATIONS:

- Detection of H_2S at 10 ppm or greater:
  - Illumination of amber beacons within Plant
  - Activation of a "high" audible control room alarm to notify the Control Room Operator.
- Detection of H_2S at 20 ppm or greater:
  - Illumination of amber beacons within Plant
  - Activation of a "high-high" audible control room alarm to notify the Control Room Operator.
- Activation of intermittent audible horn (4 second pulses) if any fixed monitor senses H_2S at 20 ppm or greater.
- The horn and amber beacons are redundant systems which function independently of one another so that should one system fail, the other would remain active. These systems incorporate backup battery capabilities as recommended in API RP 55 which insure their operation in the event of a power failure.
- A computer in the Control Room and in the office of the Plant Manager establishes the location of the monitor(s), at the Plant or Wellsite, that has activated the alarm and/or amber beacons.
- All employees also wear personal monitors that sound an audible alarm at 10 ppm H_2S or greater.

ACTIONS

1. At the initial sound of an audible alarm or the sight of an illuminated amber beacon, responding Operator(s) in the vicinity of the alarm will put on 30-minute Self-Contained Breathing Apparatus (SCBA) and help any person(s) in distress evacuate to Emergency Assembly Area 1 and attempt to resolve the release.
2. All other non-essential personnel in the Plant complex shall immediately proceed, using the designated evacuation routes, to Emergency Assembly Area 1 (see Figure 3).
3. Control Room Operator and Plant Manager will be notified of the release. Plant Manager or designee will assume the role of Incident Commander (IC). Control Room Operator will remain in the control room, identify the location(s) of the alarms and monitor H_2S concentrations throughout the Plant.
4. If a perimeter monitor detects 10 ppm H_2S or greater, all entities and individuals located within the 500 ppm ROE (see Figure 4) will be notified by the IC or designee that a release is occurring and to stand by for further instructions. Entities will be advised to alert their employees and any third parties working for them, or imminently scheduled to work in the area, of the release and to leave the area and not return until further notice. (Phone numbers are listed in Appendix C).
5. If deemed necessary, Plant personnel as designated by the IC will contact local emergency response service providers (phone numbers provided in Appendix C).
6. All personnel will be accounted for at Emergency Assembly Area 1 using the Plant sign in sheet and air quality will be monitored for H_2S concentrations. If H_2S concentrations reach 10 ppm or greater at Emergency Assembly Area 1, all personnel will be evacuated to Emergency Assembly Area 2 using the designated routes (see Figures 3 and 4).
7. If the concentration of H_2S in the control room reaches 10 ppm, the Control Room Operator will also put on a 30- minute SCBA.

8. Responding Operator(s) wearing SCBAs will assess the location of the alarm and attempt to make an initial determination of its cause and rule out potential false alarms based on sensor malfunction or other conditions. If the cause of the release is a minor problem such as a packing or seal leak, the Operator(s) will attempt to take the necessary steps to correct the situation and eliminate the source of the release.
9. IC will designate secondary re-entry teams in 30-minute SCBA's to re-enter and resolve the situation. Re-entry will occur in 15-minute increments at the direction of the IC until the problem is resolved or Operators activate ESD.
10. If corrective actions are successful, and the release is resolved and monitored H_2S levels in the Plant return to less than 10 ppm, the IC or designee will signal all clear and personnel will be allowed to sign in and re-enter the Plant to resume work. If the release is not resolved and H_2S levels continue to rise, IC will initiate a Level 2 Response.
11. The IC will initiate and maintain a Chronologic Record of Events Log (see Appendix F).
12. The Plant Manager or designee will contact the Oil Conservation Division (OCD) district office within 4 hours of a release that activates the plan only at Level 3.

	**NOTE:** Per 19.15.11.16 NMAC and 19.15.29 NMAC, notification of Contingency Plan implementation will be submitted to the OCD via form C-141 within 15 days of a release greater than 50 MSCF.

LEVEL 2 ACTIVATION

ACTIVATING CONDITIONS:

- Corrective actions at Level 1 are unsuccessful.
- 90 ppm of H_2S or greater is detected for a sustained period at any fixed monitor.
- Operators activate ESD for an unexpected release not rapidly resolved.

ALARMS AND AUTOMATED ACTIVATIONS:

- While activation occurs at 90 ppm, the automated ESD, Control Room Operator, or Plant Manager may proactively trigger a shutdown at 40 ppm to minimize Level 2 events and/or prevent the potential for Level 3 events.
- A Continuous facility-wide evacuation horn and illuminated amber beacons will occur. The horn and beacon beacons are redundant systems which function independently of one another so that should one system fail, the other would remain active. These systems incorporate backup battery capabilities as recommended in API RP 55 which insure their operation in the event of a power failure.

ACTIONS

1. The responding Operator(s) will put on SCBAs and help any persons in distress to evacuate to Emergency Assembly Area 2 (see Figure 4).
2. The Plant Manager and the Control Room Operator will be notified. The Plant Manager, or designee will assume the role of IC. The Control Room Operator will put on SCBA, remain in the control room, and monitor H_2S concentrations throughout the Plant.
3. All personnel will be evacuated to Emergency Assembly Area 2 via designated routes (see Figure 4).
4. At Emergency Assembly Area 2, all personnel will be accounted for using the Plant sign-in list and air quality will continue to be monitored for H_2S at Emergency Assembly Area 2.
5. If two or more monitors within the AGI fenced area, or around the AGI compressor detect 90 ppm H2S or greater, the automated ESD, Control Room Operator, or Plant Manager may proactively trigger a shutdown of the AGI Compression to minimize the potential for Level 3 events.
6. The Plant ESD can be activated at any time by the Titan Treatment Plant Operators and is to be activated if efforts to control the release have failed, or if a catastrophic release has occurred.
7. Incident Command Center (ICC) will be established at Emergency Assembly Area 2.
8. A media staging area adjacent to Emergency Assembly Area 2 will be established and all media will be directed to it.
9. IC will designate personnel with H_2S monitors and emergency trailers to remain at Emergency Assembly Area 2. Trailers are to be deployed to roadblock locations along State Road 128 (SR128) outside of the 100 ppm ROE upon Level 3 activation.
10. Designated personnel will notify all entities, individuals, and producers within the 500 and 100 ppm ROE (phone numbers provided in Appendix C) of the nature of the release and the status of containment. All will be instructed to evacuate, or shelter in place, depending on the nature of the release and the prevailing wind conditions. They will be instructed to immediately alert all company personnel, third party contractors and/or service companies working in the area and those imminently scheduled to work in the area of the Plant evacuation status and advise them to leave and not enter, or re-enter the Plant vicinity until further notice.
11. Notifications by designated personnel will commence as follows:

a. Anyone in immediate danger such as plant personal or contractors on site
b. All entities, individuals, and producers within in 500 and 100 ppm ROE

12. Re-entry will occur in full SCBA and at 15-minute increments at the direction of the IC until IC determines problem has been resolved or Operators activate ESD.
13. If release is resolved and monitored levels of H_2S in the Plant are less than 10 ppm, IC or designee may authorize personnel to return to the Plant.
14. All entities and individuals previously notified will be informed that the release has been resolved and advised of the current monitored H_2S levels.
15. If monitored H_2S levels at Emergency Assembly Area 2 exceed 10 ppm, all personnel will evacuate to General Emergency Assembly Area 3 via designated route (see Figure 4).
16. If the release is not resolved or H_2S levels continue to increase to a PHV, the IC will initiate a Level 3 Response.
17. The IC will initiate and maintain a Chronologic Record of Events log. (Appendix F)
18. The Plant Manager or designee will contact the Oil Conservation Division (OCD) district office within 4 hours of a release that activates the plan only at Level 3.

	NOTE: Per 19.15.11.16 NMAC and 19.15.29 NMAC, notification of Contingency Plan implementation will be submitted to the OCD via form C-141 within 15 days of a release greater than 50 MSCF.

LEVEL 3 ACTIVATION

ACTIVATING CONDITIONS:

- Corrective actions at Level 2 are unsuccessful;
- H_2S concentrations reach 10 ppm or greater at Emergency Assembly Area 2;
- A catastrophic release, fire, explosion;
- A continuous release of maximum volume for 24 hours occurs;
- As per NMAC 19.15.11 there is indication of a PHV in which 100ppm H_2S in any defined public area, 500ppm at any public road, or 100 ppm at a distance greater than 3,000 feet from the site of the release.

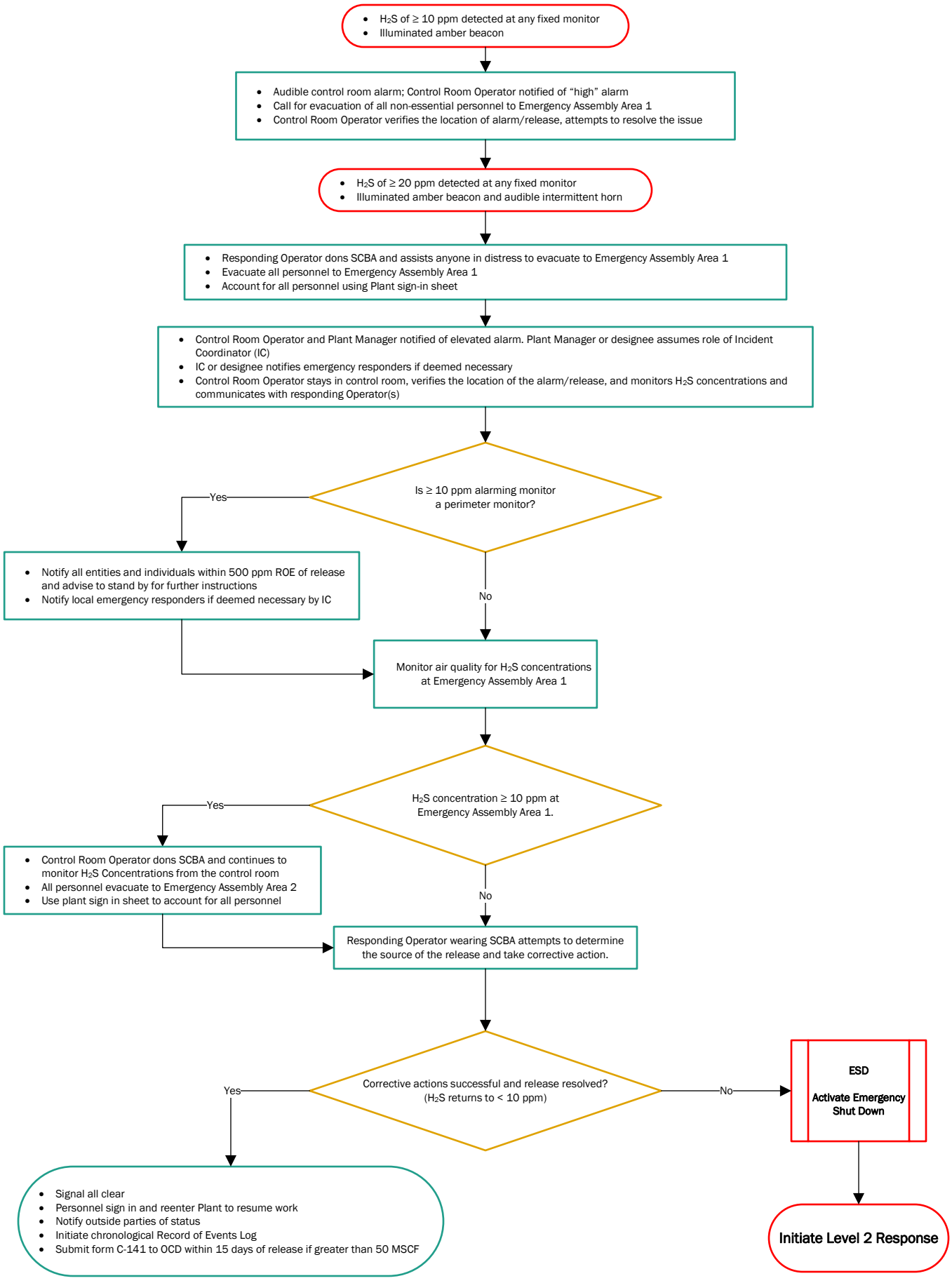
ACTIONS

1. All personnel shall have been or will immediately be evacuated to and accounted for at Emergency Assembly Area 3 using the Plant sign in sheet, and air quality will be monitored for H_2S concentrations (see Figure 4).
2. IC shall have activated or will immediately activate Plant ESD.
3. The ICC and media staging area shall be established and/or moved to Emergency Assembly Area 3.
4. Dispatch personnel with emergency trailers to move or establish designated Level 3 roadblocks on SR128 to prevent entry into the 100 ppm ROE (see Figure 4). Monitor H_2S concentrations at the roadblocks.
5. Local emergency responders, state agencies, including the OCD District Office, will be notified of the release and status of containment (phone numbers provided in Appendix C).
6. All individuals and entities within the 100 ppm ROE will already have been or shall be notified to evacuate or shelter in place. IC will review the status of evacuation and make the final decision whether individuals within the 100 ppm ROE should evacuate or shelter in place based on, but not limited to H_2S concentration, wind conditions and whether a safe evacuation can be implemented. If individuals within the 100 ppm ROE are instructed to evacuate, IC will recommend an evacuation route. All entities will be instructed to immediately alert all company personnel, third party contractors and/or service companies working in the area and those imminently scheduled to work in the area of the Plant evacuation status and advise them to leave and not enter or re-enter the Plant vicinity until further notice. All will be advised of the roadblocks deployed along SR128.
7. If escaping vapors have been ignited, the vapors should be allowed to continue to burn unless the fire endangers personnel, the public, other property, or other equipment.
8. Re-entry will occur in full SCBA and cascade breathing air systems at the direction of the IC until IC determines problem has been resolved.
9. Once release is resolved and monitored levels of H_2S in the Plant are less than 10 ppm, IC or designee may authorize personnel to sign in and return to the Plant.
10. All entities and individuals previously notified will be informed that the release has been resolved and advised of the current monitored H_2S levels at the Plant. Roadblocks will be recalled and traffic will be restored.
11. The IC will initiate and maintain a Chronologic Record of Events log. (Appendix F)
12. The Plant Manager or designee will contact the Oil Conservation Division (OCD) district office within 4 hours of a release that activates the plan at Level 3. Per 19.15.11.16 NMAC and 19.15.29 NMAC, notification of Contingency Plan implementation will be submitted to the OCD via form C-141 within 15 days of a release greater than 50 MSCF.

	NOTE: Per 19.15.11.16 NMAC and 19.15.29 NMAC, notification of Contingency Plan implementation will be submitted to the OCD via form C-141 within 15 days of a release greater than 50 MSCF.

Appendix C Response Flow Diagrams

Titan Gas Treatment Plant – Level 1 Activation Response Flow



Titan Gas Treatment Plant – Level 2 Activation Response Flow

- Corrective actions at Level 1 are unsuccessful
- Sustained H_2S of ≥ 90 ppm at any fixed monitor
- Operators Activate ESD for unexpected release not rapidly resolved
- Continuous evacuation horn and illuminated amber beacons.

H_2S ≥ 90 ppm at 2 or more monitors within fenced AGI area or around AGI compressor?

No

- Responding Operator dons SCBA and assists anyone in distress to evacuate to Emergency Assembly Area 2.
- Evacuate all personnel to Emergency Assembly Area 2.
- Account for all personnel using Plant sign-in sheet.

- Control Room Operator and Plant Manager are notified.
- Plant Manager or designee assumes role of Incident Coordinator (IC)
- Control Room Operator dons SCBA and remains in Control Room to monitor H_2S concentrations throughout the plant.

- Establish Incident Command Center (ICC) at Emergency Assembly Area 2
- Establish Media Staging Area adjacent to Emergency Assembly Area 2 and direct all media to it.
- Monitor H_2S at Emergency Assembly Area 2.

- Dispatch personnel with roadblock trailers to Emergency Assembly Area 2.
- Await deployment instructions required by Level 3 activation.

H_2S concentration ≥ 10 ppm at Emergency Assembly Area 2.

Yes

No

Notify the following and advise of release and status of containment:
- Entities and individuals within the 100 and 500 ROE.
  - Advise to evacuate or shelter in place.
  - Instruct to have all personnel and third parties to leave and not re-enter Plant vicinity until further instructed.

Designate personnel in SCBA to re-enter Plant and attempt to identify and resolve the release in 15-minute increments.

Corrective actions successful and release resolved? (H2S returns to < 10 ppm)

No

Yes

ESD

If not previously activated, **Emergency Shut Down** may be activated at any time at the discretion of the IC if efforts to control the release have failed or a catastrophic release occurs

Shut Down AGI Compressor

- Signal all clear
- Personnel sign in and reenter Plant to resume work
- Notify outside parties of status
- Initiate chronological Record of Events Log
- Submit form C-141 to OCD within 15 days of release if greater than 50 MSCF

Evacuate all personnel to General Assembly Area 3

Initiate Level 3 Response

Titan Gas Treatment Plant – Level 3 Activation Response Flow

- Corrective actions at Level 2 are unsuccessful
- H_2S concentrations reach ≥ 10 ppm at Emergency Assembly Area 2
- A catastrophic release, fire, or explosion
- A continuous release of maximum volume for 24 hours occurs
- As per NMAC 19.15.11 there is indication of a PHV for which 100 ppm H_2S in any defined public area, 500 ppm at any public road, or 100 ppm at a distance greater than 3,000 feet from the site of the release

- Evacuate all personnel to Emergency Assembly Area 3
- Account for all personnel using Plant sign-in sheet
- Verify that ESD has been activated

ESD

Verify that emergency shut down has been activated

- Establish or move Incident Command Center (ICC) and media staging area to Emergency Assembly Area 3.
- Monitor H_2S at Emergency Assembly Area 3.

- Establish designated Level 3 roadblocks blocking entry to the 100ppm ROE.
- Monitor H_2S Concentrations at roadblocks.

Notify the following and advise of release and status of containment:

- Local emergency responders, BLM and state agencies, including OCD District office
- Entities and individuals within the 100 and 500 ROE
  - Advise to evacuate or shelter in place based on H_2S concentrations, wind conditions, etc.
  - Recommend safe evacuation route
  - Inform of Roadblocks

Escaping vapors ignited?

Yes → Allow vapors to burn unless fire endangers public, other property, or other equipment

No → Designate personnel in full SCBA and cascade breathing systems to re-enter Plant and attempt to identify and resolve the release

- Signal all clear.
- Personnel sign in and reenter Plant to resume work.
- Notify outside parties of status.
- Recall roadblocks and restore traffic.
- Initiate chronological Record of Events Log.
- Notify OCD within 4 hours of release
- Submit form C-141 to OCD w/in 15 days of release if greater than 50 MSCF

Appendix D Telephone Numbers/Emergency Call List

The following contains information on residences, businesses, public receptors and producers within the 100 PPM Radius of Exposure (ROE).

Residences		
Residence	Residence Location	Phone
Ralph Ramstetter	193 Anthony Rd Jal, NM 88252	575-706-7973

Businesses		
Business	Business Location	Phone
Beckham Ranch, Inc.	236 Beckham Rd Jal, NM 88252	575-395-3230

Producers		
Producer	Office Location	Phone
Ameredev Operating, LLC	2901 Via Fortuna, Suite 600	737-300-4700
Caza Operating, LLC	Austin, TX 78746	432-682-7424
Salt Creek Midstream, LLC	200 N Lorine St, Suite 1550	281-949-8794
Fulfer Oil & Cattle, LLC	Midland, TX 79701	505-935-9970
Northern Pacific Oil & Gas Inc.	5825 N Sam Houston Pkwy W Suite 150 Houston, TX 77086	505-738-3809

Northwind Company Internal Notification		
Name	Title	Phone
Alonzo Villalobos	Plant Manager	404-354-4077
Reagan Register	Director of Operations	432-250-5888
Josh Barker	HSE Supervisor	432-631-5164
David Barton	Director of Environmental, Health, Safety and Regulatory	817-266-8865
Operations Response Team Includes: • Plant Manager • Plant/Pipeline Operators • Technicians	Please Note: Operators work in shifts (24/7). The 8am-5pm shift, Monday-Friday, includes a manager, maintenance technicians, and 2 operators. All Operations Response Team Personnel are Emergency Responders and are HAZWOPER Certified and fit tested for respirators and SCBA	432-250-5888
2 Individuals	Plant/Pipeline Operators	432-250-5888
0-2 Individuals	Maintenance Technicians	432-250-5888

Emergency Responders	
Agency	Phone
Emergency Dispatch	911
Hobbs Fire and EMS Department	575-397-9308
Hobbs Police Department	575-397-9265
Jal Fire and EMS Department	575-395-2221
Eunice Fire and EMS Department	575-394-3258
New Mexico State Police (Hobbs)	575-392-5588
Lea County Sheriff's Office	575-396-3611
Hobbs-Lea Regional Medical Center	575-492-5000
Lubbock University Medical Center (UMC) (Level 1 Trauma Center)	800-345-9911
American Association of Poison Control Centers	800-222-1222
HELICOPTER SERVICES: Lubbock University Medical Center Transfer to Level 1 Trauma Center	800-345-9911

County and Local Law Enforcement; Public Authorities; Local Government Agencies		
Agency		Phone
Oil Conservation Division	Santa Fe Office	505-476-3441
	District 1 Office, Lea County (Hobbs)	575-241-7063
Local Emergency Planning Committee (LEPC) – Lea County		575-605-6561
New Mexico State Police (Hobbs)		575-392-5580
Lea County Sheriff's Office		575-396-3611
National Response Center (NRC) Response Center		800-424-8802
New Mexico Department of Homeland Security and Emergency Management (NMDHSEM)		505-476-9635
City of Jal City Manager		575-395-3340

NORTHWIND MIDSTREAM

Appendix E Radius of Exposure Calculation

Northwind Titan		ROE CALCULATIONS PURSUANT TO RULE 11			
If data is provided in mole% use calculator below for getting ppm					
Enter Mole % in cell C5	Mole %	ppm			
Convert mole% to ppm	1.5	15000			
If data is provided in mole fraction use calculator below for getting ppm					
Enter Mole Fraction in cell C10	Mole Fraction	ppm			
Convert mole fraction to ppm	0.015	15000			
Use ppm derived from either of above calculations to input data below					
Input Data Here	H_2S Concentration (ppm)	15000			
	24 Hour Throughput (MMCFD)	200			

The radius of exposure is calculated using the following equations:

100 ppm ROE calculation (as per 19 NMAC 15.11.7.K.1)

$$X_{100ppm} = [(1.589)(Conc_{H2S})(Q)]^{(0.6258)}$$

500 ppm ROE calculation (as per 19 NMAC 15.11.7.K.2)

$$X_{500ppm} = [(0.4546)(Conc_{H2S})(Q)]^{(0.6258)}$$

Where:

X = radius of exposure (ft)

$Conc_{H2S}$ = the decimal equivalent of the mole or volume fraction of H_2S in the gas

Q = daily plant throughput corrected to standard conditions (SCFD)

Plant parameters

Q =	200	MMSCFD =	200000000	SCFD		
$Conc_{H2S}$ =	15000	ppm =	1.5	Mole %=	0.015	Mole Fraction

ROE calculation:

X_{100ppm} = [(1.589)*(0.015)*(200000000)]^(0.6258)

X_{100ppm} = 15109 ft = **2.86 miles**

X_{500ppm} = [(0.4546)*(0.015)*(200000000)]^(0.6258)

X_{500ppm} = 6904 ft = **1.31 miles**

Appendix F H_2S Contingency Plan Distribution List

- Nearby Residents (if applicable)
- New Mexico Oil Conservation Division, Santa Fe Office
- New Mexico Department of Public Safety (State Office)
- Lea County LEPC/Emergency Manager*
- City of Jal City Manager
- Titan Treatment Plant Manager's Office
- Titan Treatment Plant Control Room
- Northwind Corporate Office
- Titan Treatment Plant and Flight, Siege, and Pelican Emergency Trailers
- New Mexico State Police, Hobbs Office
- State of New Mexico Emergency Response Commission (SERC)

	**NOTE:** The Lea County LEPC Emergency Manager will make and send copies of this plan to appropriate entities within his jurisdiction, including the Hobbs Fire Department.

Appendix G Chronologic Record of Events Log

ACTIVITY LOG (ICS 214)

1. Incident Name:	2. Operational Period: Date From: Date To: Time From: Time To:	
3. Name:	4. ICS Position:	5. Home Agency (and Unit):

6. Resources Assigned:

Name	ICS Position	Home Agency (and Unit)

7. Activity Log:

Date/Time	Notable Activities

8. Prepared by: Name: _____ Position/Title: _____ Signature: _____

ICS 214, Page 1 Date/Time: _____

ACTIVITY LOG (ICS 214)

1. Incident Name:	2. Operational Period: Date From: Date To: Time From: Time To:

7. Activity Log (continuation)**:**

Date/Time	Notable Activities

8. Prepared by: Name: _____ Position/Title: _____ Signature: _____

ICS 214, Page 2 Date/Time: _____

ICS 214
Activity Log

Purpose. The Activity Log (ICS 214) records details of notable activities at any ICS level, including single resources, equipment, Task Forces, etc. These logs provide basic incident activity documentation, and a reference for any after-action report.

Preparation. An ICS 214 can be initiated and maintained by personnel in various ICS positions as it is needed or appropriate. Personnel should document how relevant incident activities are occurring and progressing, or any notable events or communications.

Distribution. Completed ICS 214s are submitted to supervisors, who forward them to the Documentation Unit. All completed original forms must be given to the Documentation Unit, which maintains a file of all ICS 214s. It is recommended that individuals retain a copy for their own records.

Notes:

- The ICS 214 can be printed as a two-sided form.
- Use additional copies as continuation sheets as needed, and indicate pagination as used.

Block Number	Block Title	Instructions
1	**Incident Name**	Enter the name assigned to the incident.
2	**Operational Period** • Date and Time From • Date and Time To	Enter the start date (month/day/year) and time (using the 24-hour clock) and end date and time for the operational period to which the form applies.
3	**Name**	Enter the title of the organizational unit or resource designator (e.g., Facilities Unit, Safety Officer, Strike Team).
4	**ICS Position**	Enter the name and ICS position of the individual in charge of the Unit.
5	**Home Agency** (and Unit)	Enter the home agency of the individual completing the ICS 214. Enter a unit designator if utilized by the jurisdiction or discipline.
6	**Resources Assigned**	Enter the following information for resources assigned:
	• Name	Use this section to enter the resource's name. For all individuals, use at least the first initial and last name. Cell phone number for the individual can be added as an option.
	• ICS Position	Use this section to enter the resource's ICS position (e.g., Finance Section Chief).
	• Home Agency (and Unit)	Use this section to enter the resource's home agency and/or unit (e.g., Des Moines Public Works Department, Water Management Unit).
7	**Activity Log** • Date/Time • Notable Activities	• Enter the time (24-hour clock) and briefly describe individual notable activities. Note the date as well if the operational period covers more than one day. • Activities described may include notable occurrences or events such as task assignments, task completions, injuries, difficulties encountered, etc. • This block can also be used to track personal work habits by adding columns such as "Action Required," "Delegated To," "Status," etc.
8	**Prepared by** • Name • Position/Title • Signature • Date/Time	Enter the name, ICS position/title, and signature of the person preparing the form. Enter date (month/day/year) and time prepared (24-hour clock).

Appendix H NMOCD Form C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # *(assigned by OCD)*
Contact mailing address	

Location of Release Source

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# *(if applicable)*

Unit Letter	Section	Township	Range	County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (*Name:* _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)
Cause of Release		

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☐ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

☐ The source of the release has been stopped.

☐ The impacted area has been secured to protect human health and the environment.

☐ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.

☐ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☐ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☐ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☐ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☐ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☐ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☐ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☐ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☐ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☐ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☐ Yes ☐ No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: ***Each of the following items must be included in the report.***

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

Form C-141
Page 4

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: _____ Title: _____

Signature:_____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: ***Each of the following items must be included in the plan.***

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: ***Each of the following items must be confirmed as part of any request for deferral of remediation.***

☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.

☐ Extents of contamination must be fully delineated.

☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: ***Each of the following items must be included in the closure report.***

☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC

☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)

☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)

☐ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Operator: Northwind Midstream Partners LLC 811 Louisiana St Houston, TX 77002	OGRID: 331501
	Action Number: 349860
	Action Type: [UF-H2S] H2S Contingency Plan (H2S Plan)

CONDITIONS

Created By	Condition	Condition Date
joel.stone	None	6/4/2024